BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| Washington Utilities and Transportation |) | Docket Nos. | UE-040640 |
|-----------------------------------------|---|----------------------|-------------|
| Commission, |) | | UG-040641 |
| |) | | |
| Plaintiff, |) | NORTHWEST INDUSTRIAL | |
| |) | GAS USERS' | PETITION TO |
| V. |) | INTERVENE | |
| |) | | |
| Puget Sound Energy, Inc. |) | | |
| |) | | |
| Respondent. |) | | |
| | | | |

Pursuant to WAC § 480-07-355, the Northwest Industrial Gas Users ("NWIGU") hereby submit this Petition to Intervene in the above-captioned proceedings. As required by WAC § 480-07-145(2)(d), NWIGU has provided this Petition in electronic format on the enclosed floppy disk. In support of this Petition to Intervene, NWIGU states the following:

1. The following name and address for NWIGU should be included on the official list of parties of record in these proceedings, and all correspondence and communications concerning these proceedings should be addressed to:

Paula E. Pyron Executive Director Northwest Industrial Gas Users 4113 Wolf Berry Court Lake Oswego, OR 97035-1827 Telephone: (503) 636-2580 Facsimile: (503) 636-0703

Facsimile: (503) 636-0703 E-mail: ppyron@nwigu.org Paula Pyron is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

Ed Finklea and Chad Stokes of Cable Huston Benedict Haagensen & Lloyd LLP will represent NWIGU in these proceedings, and have filed a separate Notice of Appearance as required in WAC § 480-07-345(2). All correspondence and communications concerning these proceedings should be addressed to:

Edward A. Finklea Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd LLP 1001 SW 5th Avenue Suite 2000 Portland, OR 97204-1136

Telephone: (503) 224-3092 Facsimile: (503) 224-3176 E-mail: efinklea@chbh.com cstokes@chbh.com

- 2. NWIGU is a nonprofit association comprised of thirty-two end-users of natural gas with major facilities in the states of Washington, Oregon and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics and aerospace. The association provides an information service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase natural gas sales and transportation services from local distribution companies ("LDCs"), including Puget Sound Energy, Inc. ("PSE" or the "Company").
- 3. On April 5, 2004, PSE submitted to the Washington Utilities and Transportation Commission ("WUTC" or "Commission") a filing requesting general rate increases for both its

gas and electric operations. PSE's filing proposes to increase its retail electric rates by approximately \$81.6 million or approximately 6.5 percent. PSE also seeks to increase the rates it charges for natural gas local delivery by \$47.2 million, which is approximately a 13 percent increase in the Company's current gas delivery charges. On April 28, 2004, the Commission issued its orders suspending the Company's proposed tariff revisions in both its gas and electric filings and instituted hearing procedures to address their investigation.

- 4. As a combined gas and electric utility, PSE's request for authority to charge higher rates for both its electric and natural gas delivery services will impact NWIGU member companies' interests. NWIGU members have a direct and substantial interest in PSE's request for authority to increase the rates charged its natural gas sales and transportation customers for delivery services. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.
- 5. NWIGU reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in these proceedings.
- 6. NWIGU's participation in these proceedings will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, unduly burden the record, or delay these proceedings.

WHEREFORE, based upon the foregoing, NWIGU respectfully requests leave to intervene as a party in these proceedings, with all of the procedural and substantive rights associated with full party status as described in WAC § 480-07-340.

Dated: May 11, 2004.

Respectfully submitted,

Edward A. Finklea
Edward A. Finklea

Chad M. Stokes

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Of Attorneys for the

Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon all parties of record in these proceedings by mailing a copy properly addressed with first class postage prepaid.

Dated in Portland this 11th day of May, 2004.

Edward A. Finklea

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a Firkler

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