

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant

v.

CASCADE NATURAL GAS CORP.

Respondent.

DOCKET NOS. UG-121592

NORTHWEST INDUSTRIAL GAS
USERS' PETITION TO INTERVENE

1. The Northwest Industrial Gas Users ("NWIGU") hereby submit this Petition to Intervene in the above-captioned proceeding.
2. 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:

Ed Finklea
Executive Director
Northwest Industrial Gas Users
326 Fifth Street
Lake Oswego, Oregon 97034
Telephone: (503) 303-4061
Facsimile: (503) 303-4941
E-mail: efinklea@nwigu.org

Ed Finklea is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

3. Chad M. Stokes and Tommy A. Brooks of Cable Huston will represent NWIGU in these proceedings and have filed a separate Notice of Appearance as required in WAC §480-07-

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345(2). All correspondence and communications concerning these proceedings should be addressed to:

Chad M. Stokes
Tommy A. Brooks
Cable Huston
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
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E-mail: dws@r-c-s-inc.com

4. This Petition to Intervene is submitted pursuant to WAC § 480-07-355. As required by WAC §480-07-145(2)(d), NWIGU has provided this Petition by electronic mail. In support of this Petition to Intervene, NWIGU states the following:
5. NWIGU is a nonprofit association comprised of thirty-eight 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 Cascade Natural Gas (“Cascade”).
6. On October 1, 2012, Cascade filed with the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) several tariff sheets for the stated purpose of passing on rate adjustments designed to reflect the cost of gas in Cascade’s gas supply portfolio. On October 31, 2012, the WUTC allowed the filed tariffs to go into effect on a temporary basis and

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suspended the filing for further investigation. No prehearing conference has been set or other procedural schedule established, other than that the WUTC directed Staff to report to the Commission on March 1, 2013.

7. The rates in the tariffs filed in this docket will impact the interests of NWIGU member companies. Those rates are based in part on Cascade's release of Wenatchee Lateral capacity. Before the Commission approves the rate adjustments, the Commission should determine that the release was prudent. NWIGU members have a direct and substantial interest in the cost of gas in Cascade's portfolio. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.

8. 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.

9. NWIGU's participation in these proceedings will assist the Commission in its investigation and in resolving the issues in these proceedings and will not unreasonably broaden the issues, unduly burden the record, or delay these proceedings.

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10. 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: January 11, 2013.

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 00400
Tommy A. Brooks, WSB 40237, OSB 076071
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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 (listed below) in this proceeding by electronic mail and by mailing a copy properly addressed with first class postage prepaid.

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Dated in Portland, Oregon this 11th day of January, 2013.



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