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September 8, 2006

**VIA FEDERAL EXPRESS
& ELECTRONIC FILING**

Carol Washburn
Executive Secretary
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: *WUTC vs. Cascade Natural Gas Corporation*
Docket No. UG-060256

Dear Ms. Washburn:

This letter submits for filing the original and eleven copies of the Northwest Industrial Gas Users' Response to Bench Request No. 1 in the above-referenced proceeding.

Paper copies will be sent via First Class Mail to all parties on the current service list.

Thank you for your assistance.

Very truly yours,



Edward A. Finklea

EAF/tr
Enclosures
cc: Service List

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket No. UE-060256

WUTC v. CASCADE

**RESPONSE OF NORTHWEST INDUSTRIAL GAS USERS TO WUTC
BENCH REQUEST NO. 1**

BENCH REQUEST NO. 1

Please identify whether you have obtained a functioning or “working” copy of the cost allocation or cost-of-service model referred to in the testimony of Lamar Maxwell Dickey (LMD-1T), or if you have arranged for access to the model. If yes, please describe the arrangements you have made for access to, or a “working” copy of, the model.

RESPONSE

No, we have never received an actual working copy of Mr. Dickey’s cost-of-service model. We were informed by Cascade that we could only obtain a working model of the cost-of-service study if we paid Mr. Dickey’s consulting firm to obtain the model. Because Cascade failed to produce Mr. Dickey’s model, Mr. Schoenbeck, NWIGU’s consultant and witness in the case, embarked on replicating the cost-of-service model. Mr. Schoenbeck was successful in replicating the model without using any proprietary information from Mr. Dickey. Although the effort came at some expense for NWIGU, Mr. Schoenbeck now has a working cost-of-service model that is absolutely accurate and produces transparent results. It is our understanding that Public Counsel and WUTC Staff agree with both the accuracy and transparency of Mr. Schoenbeck’s model.

Responder: Edward A. Finklea
Prepared: September 8, 2006
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