

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UG-110723
TRANSPORTATION COMMISSION,)	
Complainant,)	NORTHWEST INDUSTRIAL GAS
)	USERS' PETITION TO INTERVENE
v.)	
)	
PUGET SOUND ENERGY, INC.,)	
)	
Respondent.)	
)	
)	
)	

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 this proceeding, and all correspondence and communications concerning this proceeding 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
E-mail: ppyron@nwigu.org

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

3. Chad Stokes and Tommy Brooks of Cable Huston will represent NWIGU in this proceeding and have filed a separate Notice of Appearance as required in WAC §480-07-345(2).

All correspondence and communications concerning this proceeding 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
E-mail: cstokes@cablehuston.com
tbrooks@cablehuston.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, including Puget Sound Energy, Inc., (“Puget”).

6. On April 26, 2011, Puget filed with the Washington Utilities and Transportation Commission (“Commission”) revisions to its currently effective Tariff WN U-2. On June 29,

PAGE 2 – NWIGUS’ PETITION TO INTERVENE

2011 and July 14, 2011, Puget filed substitute tariff sheets. Puget requests a new cost recovery mechanism through a new Schedule 134, Pipeline Integrity Program. The new schedule would increase natural gas service revenues by approximately \$107,440 between August 1, 2011 and October 31, 2011, and by \$1.95 million for the period between November 1, 2011 and October 31, 2012

7. Puget's request for authority to implement Schedule 134 as proposed will impact the interests of NWIGU member companies. NWIGU members have a direct and substantial interest in Puget's request. 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 this proceeding.

9. NWIGU's participation in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, unduly burden the record, or delay this proceeding.

///

///

///

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

Dated: July 21, 2011.

Respectfully submitted,



Chad M. Stokes, WSBA 37499, OSB 00400
Tommy A. Brooks, WSBA 40237, OSB 076071
Cable Huston Benedict Haagensen & Lloyd
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

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.

Sally Brown
Assistant Attorney General
WUTC
PO Box 40128
Olympia, WA 98504-0128
sbrown@utc.wa.gov

Simon ffitch
Office of the Attorney General
800 Fifth Avenue STE 2000
Seattle, WA 98104-3188
simonf@atg.wa.gov

Tom DeBoer
Director, Rates & Regulatory Affairs
Puget Sound Energy (E012)
PO BOX 97034, PSE-08N
Bellevue, WA 98009-9734
tom.deboer@pse.com

Dated in Portland, Oregon this 21st day of July, 2011.



Chad M. Stokes, WSBA 37499, OSB 00400
Tommy A. Brooks, WSBA 40237, OSB 076071
Cable Huston Benedict Haagensen & Lloyd
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users