## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	) DOCKET NO. UG-060256 )
Complainant,	) NORTHWEST INDUSTRIAL GAS ) USERS' PETITION TO INTERVENE
v.	
CASCADE NATURAL GAS CORPORATION, Respondent.	) ) ) )
	_)

The Northwest Industrial Gas Users ("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceedings.

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
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 Fifth Avenue, Suite 2000 Portland, OR 97204-1136

Telephone: (503) 224-3092 Facsimile: (503) 224-3176

E-mail: efinklea@chbh.com cstokes@chbh.com

Don Schoenbeck RCS, Inc. 900 Washington St. Ste. 780 Vancouver, WA 98660 E-mail: dws@r-c-s-inc.com

- 2. 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:
- 3. 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 Cascade Natural Gas Corporation ("Cascade" or the "Company").

- 4. On February 14, 2006, Cascade submitted to the Washington Utilities and Transportation Commission ("WUTC" or "Commission") a filing requesting a general rate increase for its natural gas services. Cascade's filing proposes an overall general rate increase of 4.47% or \$11.7 million, with a requested effective date of March 16, 2006. The WUTC has suspended the filing and set the matter for hearing.
- 5. Cascade's request for authority to charge higher rates for its natural gas services will impact the interests of NWIGU member companies. NWIGU members have a direct and substantial interest in Cascade's request for authority to increase the rates charged to natural gas customers. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.
- 6. 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.
- 7. 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.

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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: March 23, 2006.

Respectfully submitted,

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 on March 23, 2006 I caused to be served the foregoing PETITION TO INTERVENE upon all parties of record in these proceedings, as indicated below, by mailing a copy properly addressed with first class postage prepaid.

## SERVICE LIST

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DATED: March 23, 2006.

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