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CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP • ATTORNEYS

CHAD M. STOKES

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December 18, 2007

**VIA FEDERAL EXPRESS
AND 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: Washington Utilities & Transportation Commission vs. Puget Sound Energy, Inc.
Docket Nos. UG-072301 and UE-072300

Dear Ms. Washburn:

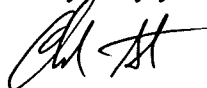
This letter submits for filing the original and seventeen copies of the following two documents:

- 1) **Northwest Industrial Gas Users' Petition to Intervene**, and
- 2) **Notice of Appearance on Behalf of the Northwest Industrial Gas Users**

These documents have also been transmitted to you via electronic mail in both PDF format. Paper copies will be mailed to all on the WUTC's current Service List.

Thank you for your assistance.

Very truly yours,



Chad M. Stokes

CMS:tr
Enclosure(s)
cc: Official Service List

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NOS.
)	UG-072301 AND UE-072300
Complainant,)	<i>(consolidated)</i>
)	
v.)	NORTHWEST INDUSTRIAL GAS
PUGET SOUND ENERGY, INC.,)	USERS' PETITION TO INTERVENE
)	
Respondent.)	
)	

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

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:

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. 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 Haagenesen & 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 Street, Suite 780
Vancouver, WA 98660
Telephone: (360) 737-3877
Facsimile: (360) 737-7628
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-five 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., (“Puget” or the “Company”).

6. On December 3, 2007, Puget submitted to the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) a filing requesting a general rate increase for its natural gas and electric services. Puget’s filing proposes a \$56.8 million or 5.31 percent increase for gas service and a \$174.5 million or 9.5 percent increase for electric service with a requested

effective date of January 3, 2008. The WUTC has suspended the filing and set the matter for hearing.

7. Puget'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 Puget'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.

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 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: December 18, 2007.

Respectfully submitted,



Edward A. Finklea, OSB 84216
Chad M. Stokes, WSB 37499, OSB 00400
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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 these proceedings by mailing a copy properly addressed with first class postage prepaid.

Tom Deboer Director, Rates & Regulatory Affairs Puget Sound Energy (E012) PO Box 97034, PSE-08N Bellevue, WA 98009-9734 Tom.deboer@pse.com	Sheree Carson Perkins Coie Representing Puget Sound Energy, Inc. 10885 NE Fourth St., Ste 700 Bellevue, WA 98004 ksdodge@perkinscoie.com
Jason Kuzma Perkins Coie Representing Puget Sound Energy, Inc. 10885 NE Fourth St., Ste 700 Bellevue, WA 98004 jkuzma@perkinscoie.com	Robert D. Cedarbaum Assistant Attorney General WUTC - Attorney General Office State Mail Stop 40128 Olympia, WA 98504 bcedarba@wutc.wa.gov
Simon ffitich, AAG Office of the Attorney General Public Counsel 800 Fifth Avenue, Ste. 2000 Seattle, WA 98104-3188 simonf@atg.wa.gov	

Dated in Portland, Oregon this 18th day of December, 2007.



Edward A. Finklea, OSB 84216
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