BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NOS. UE-111048
TRANSPORTATION COMMISSION,	AND UG-111049 (consolidated)
Complainant, v.)) NORTHWEST INDUSTRIAL GAS) USERS' PETITION TO INTERVENE
PUGET SOUND ENERGY, INC.,))
Respondent.	<i>)</i>))

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

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 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:

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

5.

6.

E-mail: cstokes@cablehuston.com tbrooks@cablehuston.com

Donald 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:

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 Puget Sound Energy, Inc., ("Puget").

On June 13, 2011, Puget filed with the Washington Utilities and Transportation

Commission ("WUTC") a request for a general rate increase for both electric and gas service.

Puget requests an electric rate increase of \$160.7 million or 8.1 percent, and a gas rate increase of \$31.9 million or 3.0 percent.

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 consolidated proceedings.
9.	NWIGU's participation in these proceedings will assist the Commission in resolving the
	issues in these consolidated 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 consolidated proceedings, with all of the procedural and substantive rights associated with full party status as described in WAC §480-07-340.

Dated: July 7, 2011.

Respectfully submitted,

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 this proceeding by electronic mail and by mailing a copy properly addressed with first class postage prepaid.

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The Kroger Co. 1014 Vine Street Cincinnati, OH 45202 dgeorge@kroger.com

Fred Meyer Stores, Inc. 3800 SE 2nd Street Portland, OR 99202

Dated in Portland, Oregon this 7th day of July, 2011.

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