

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UG-111049

**PETITION FOR LEAVE TO
INTERVENE BY COST
MANAGEMENT SERVICES, INC.**

PETITION TO INTERVENE

1. Pursuant to WAC 480-07-355(a), Cost Management Services, Inc. (“CMS”) hereby petitions the Commission for leave to intervene in the Puget Sound Energy, Inc. (“PSE”) natural-gas rate proceedings captioned above. As grounds for intervention, CMS states the following:

2. **Name and addresses of petitioner:**

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3. **Name and address of attorneys:**

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4. **Identity of petitioner:**

CMS acts as agent for 92 customers in the State of Washington, Thirty-six different industrial, commercial, governmental and institutional end-users of natural gas, owning 50 different facilities are located within the service territory of PSE. CMS seeks to participate in this proceeding on behalf of these 36 customers that take transportation service from PSE. CMS focuses its marketing efforts on a market segment consisting of businesses with significant gas consumption, but not sufficiently large to warrant in-house, energy-management expertise. For over 22 years, CMS has worked as agent for such end-users, arranging transportation services, from local distribution companies such as PSE, and natural-gas purchases from the most competitive supply options. CMS' work as agent for these end-users helps them contain their total cost of doing business, thereby helping them maintain their viability as Washington State employers.

5. **Reason for intervention:**

CMS desires to raise issues concerning PSE's commercial and industrial rates. CMS has participated as a party in prior PSE rate proceedings on behalf of PSE's smaller commercial and industrial gas customers. The 36 PSE customers to be represented by CMS in this proceeding comprise a discrete segment of the market for PSE transportation services and competitive gas supplies. They tend to have gas-consumption levels lower than the entities comprising the Northwest Industrial Gas Users group. This significant subset of PSE customers will go unrepresented in this proceeding if this intervention petition is not granted.

6. **Testimony of witnesses:**

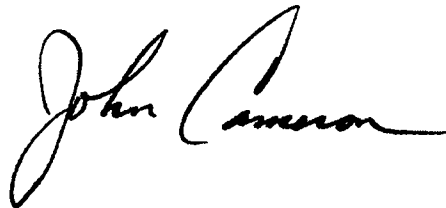
CMS may submit written direct testimony or exhibits prepared by company employees. Testimony from outside experts may also be considered. CMS also intends to cross examine the witnesses called by the other parties to this proceeding and to submit written briefs as appropriate.

7. **Request:**

CMS respectfully requests that its intervention in this proceeding be officially granted pursuant to WAC 480-07-340. Its interests, and those of the PSE customers for which it acts as agent, cannot adequately be represented by any other likely participant in the case. Participation by CMS will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

8. WHEREFORE, CMS requests leave to intervene in this proceeding.

RESPECTFULLY SUBMITTED this 18th day of July, 2011.



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Of Attorneys for
Cost Management Services, Inc.

Docket No. UG-111049
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **Petition For Leave To Intervene By Cost Management Services, Inc.** to each of the parties of record shown below in sealed envelopes, via: First class mail, and electronic mail on July 18, 2011.

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By 
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Legal Secretary