

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-090704 and
Docket No. UG-090705 (*consolidated*)

**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 above-entitled docket(s). As grounds for intervention, CMS state the following:

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

P. Douglas Betzold
Chief Executive Officer
Cost Management Services, Inc.
4210 – 85th Avenue, S.E.
Mercer Island, WA 98040

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

John A. Cameron
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland, Oregon 97201
Phone: 503-241-2300
Fax: 503-778-5299
E-mail: johncameron@dwt.com

4. **Identity of petitioner:**

CMS markets competitively priced natural gas to industrial and commercial customers, some of which are located within the service territory of Puget Sound Energy, Inc. (“PSE”). These

customers access CMS via the transportation option currently available under PSE's transportation rate scheduled. 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.

5. **Reason for intervention:**

CMS customers comprise a discrete segment of the market for competitive gas supplies. They tend to have gas-consumption levels lower than the entities comprising the Northwest Industrial Gas Users group. CMS has participated as a party in prior PSE rate proceedings on competitive supply and transportation issues relating to its own interests and those of PSE's smaller commercial and industrial gas customers.

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 cannot adequately be represented by any other likely participant in the case. CMS' knowledge of competitive gas-supply issues and its experience in prior PSE rate cases evidences that its participation in the case will serve the public interest. Participation by CMS will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding. CMS will abide by the procedural schedule adopted for this case.

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

RESPECTFULLY SUBMITTED this 18th day of June, 2009.

By: 

John A. Cameron

DAVIS WRIGHT TREMAINE LLP

1300 SW Fifth Avenue, Suite 2300

Portland, OR 97201

Phone: 503-241-2300 Fax: 503-778-5299

e-mail: johncameron@dwt.com

Of Attorneys for
Cost Management Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served this document upon all parties of record (listed below) in this proceeding by electronic mail and mailing a copy property 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
Telephone: (425)462-3272
Fax: (425)462-3414
E-Mail: tom.deboer@pse.com

Donna Barnett
Sheree Carson
Perkins Coie LLP
Representing Puget Sound Energy, Inc.
10885 N.E. Fourth Street Ste 700
Bellevue, WA 98004-5579
Phone: (425)635-1400
Fax: (425)635-2400
E-Mail: dbarnett@perkinscoie.com
E-Mail: scarson@perkinscoie.com

Danielle Dixon, Senior Policy Associate
David S Johnson
NW Energy Coalition
811 1st Avenue Ste 305
Seattle, WA 98104
Phone: (206)621-0094
Fax: (206)621-0097
E-Mail: danielle@nwenergy.org
E-Mail: david@nwenergy.org

Paula E Pyron
Executive Director
Northwest Industrial Gas Users
Representing Northwest Industrial Gas Us
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
Phone: (503)636-2580
Fax: (503)636-0703
E-Mail: ppyron@nwigu.org

Michael Early
Executive Director
Industrial Customers Of Northwest Utilities
333 SW Taylor St. Ste 400
Portland, OR 97204
Phone: (503)239-9169
Fax: (503)241-8160
E-Mail: mearly@icnu.org

Chad M. Stokes
Tommy A. Brooks
Cable Huston Benedict Haagen & Lloyd,
Representing Northwest Industrial Gas Users
1001 Sw 5th Ste 2000
Portland, OR 97204-1136
Ph:(503)232-2757
Phone: (503)224-3092
Fax: (503)224-3176
E-Mail: tbrooks@cablehuston.com
E-Mail: cstokes@cablehuston.com

Norman Furuta
Associate Counsel
Department Of The Navy
Representing Federal Executive Agencies
1455 Market Street Ste 1744
San Francisco, CA 94103-1399
Ph:(415)503-6994
Fx:(415)503-6688
E-Mail: norman.furuta@navy.mil

S. Bradley Van Cleve
Irion A Sanger
Davison Van Cleve, P.C.
Representing Industrial Customers Of Northwest
333 S.W. Taylor, Ste 400
Portland, OR 97204
Ph:(503)241-7242
Fx:(503)241-8160
E-Mail: mail@dvclaw.com

Simon Ffitch, AAG
Office Of The Attorney General
Public Counsel
800 Fifth Avenue Ste 2000
Seattle WA 98104-3188
Ph:(206)389-2055
Fx:(206)464-6451
E-Mail: simonf@atg.wa.gov

Robert D Cedarbaum, AAG
Michael Fassio, AAG
WUTC
Attorney General Office
State Mail Stop 40128
Olympia, WA 87504-0128
Ph:(360)664-1188
Fx:(360)586-5522
E-Mail: bcedarba@wutc.wa.gov
E-Mail: Mfassio@utc.wa.gov

Dated in Portland, Oregon this 18th day of June, 2009.

By



John A. Cameron
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
Phone: 503-241-2300 Fax: 503-778-5299
e-mail: johncameron@dwt.com

Of Attorneys for
Cost Management Services, Inc.