BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

1.

PUGET SOUND ENERGY, INC. and NW ENERGY COALITION

For an Order Authorizing PSE To Implement Electric and Natural Gas Decoupling Mechanisms and To Record Accounting Entries Associated With the Mechanisms DOCKET NOS. UE-121697 and UG-121704

NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE

- 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:

Ed Finklea Executive Director Northwest Industrial Gas Users 326 Fifth Street Lake Oswego, Oregon 97034

Telephone: (503) 303-4061 Facsimile: (503) 303-4941 E-mail: efinklea@nwigu.org Ed Finklea is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

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

3.

4.

5.

E-mail: nwigu@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

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 ("Puget").

6.

On October 26, 2012, Puget and the NW Energy Coalition filed with the Washington

Utilities and Transportation Commission ("WUTC") a request for authorization to implement a

decoupling mechanism. According to Puget and the NW Environmental Coalition, the proposed

decoupling mechanism will make Puget indifferent to the financial effects associated with

company-sponsored conservation and at the same time require the company to achieve higher

levels of conservation.

7.

The request for the decoupling mechanism will impact the interests of NWIGU member

companies. NWIGU members have a direct and substantial interest in the implementation of a

decoupling mechanism and NWIGU has participated in several other proceedings before the

Commission to help determine the best way to implement the goals that drive decoupling

proposals. 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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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: November 1, 2012.

Respectfully submitted,

Chad M. Stokes, WSB 37499, OSB 00400

Tommy A. Brooks, WSB 40237, OSB 076071

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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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Dated in Portland, Oregon this 1st day of November, 2012.

Chad M. Stokes, WSBA 37499, OSB 00400

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Of Attorneys for the Northwest Industrial Gas Users

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