

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)	
)	DOCKET NO. UG-101656
CASCADE NATURAL GAS)	
CORPORATION,)	
)	NORTHWEST INDUSTRIAL GAS
For an Accounting Order Authorizing)	USERS' PETITION TO INTERVENE
Deferred Accounting Treatment of Loss in)	
Margin Due to Company Sponsored)	
Conservation Programs, or, in the Alternative,)	
the Continuation of the Pilot Decoupling)	
Mechanism that was Approved in Docket)	
UG-060256)	

1. The Northwest Industrial Gas Users ("NWIGU") hereby submits 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
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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 BENEDICT
HAAGENSEN & LLOYD LLP
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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-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 Cascade Natural Gas Corporation (“Cascade”).
6. On October 1, 2010, Cascade filed with the Washington Utilities and Transportation Commission (“WUTC”) a petition for an accounting order authorizing deferred accounting treatment of loss in margin due to company sponsored conservation programs, or, in the alternative, the continuation of the pilot decoupling mechanism that was approved in Docket UG-060256. The Public Counsel (Public Counsel) Section of the Attorney General’s Office

filed a motion to dismiss the petition. Staff and Cascade have each filed a response to Public Counsel's motion. Also on November 4, 2010, the Commission issued its Report and Policy Statement on Regulatory Mechanisms, Including Decoupling, to Encourage Utilities to Meet or Exceed Their Conservation Targets in Docket U-100522 (Policy Statement). NWIGU was a party to docket U-100522.

7. 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.
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 at Portland, Oregon this 10th day of November, 2010.

Respectfully submitted,



Chad M. Stokes, WSBA #37499, OSB #004007

Tommy A. Brooks, WSBA #40237, OSB #076071

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Of Attorneys for Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing document upon all parties of record in this proceeding via postage-paid first class mail:

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DATED at Portland, Oregon this 10th day of November, 2010.

CABLE HUSTON BENEDICT
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Of Attorneys for Northwest Industrial Gas Users