

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Request of

AVISTA CORP. d/b/a AVISTA UTILITES,

For a General Rate Increase

DOCKET NO. UE-050482  
UG-050483

NORTHWEST INDUSTRIAL GAS  
USERS' PETITION TO INTERVENE

Pursuant to WAC § 480-07-355, the Northwest Industrial Gas Users ("NWIGU") hereby submit this Petition to Intervene in the above-captioned proceedings. As required by WAC §480-07-145(2)(d), NWIGU has provided this Petition in electronic format by electronic mail to the Records Center. In support of this Petition to Intervene, NWIGU states the following:

1. 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  
E-mail: [ppyron@nwigu.org](mailto:ppyron@nwigu.org)

Paula Pyron is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

Ed Finklea and Chad Stokes of Cable Huston Benedict Haagensen & Lloyd LLP 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:

Edward A. Finklea  
Chad M. Stokes  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW 5<sup>th</sup> Avenue  
Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-mail: [efinklea@chbh.com](mailto:efinklea@chbh.com)  
[cstokes@chbh.com](mailto:cstokes@chbh.com)

2. NWIGU is a nonprofit association comprised of thirty-two 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 Avista Utilities.

3. On March 30, 2005, Avista Corp. d/b/a Avista Utilities (“Avista”) submitted to the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) a filing requesting general rate increases for both its gas and electric operations. Avista’s filing proposes to increase its retail electric rates by approximately \$35.8 million or approximately 12.52 percent. Avista also seeks to increase its retail gas rates by \$2.9 million or 1.8 percent.

4. Avista’s request for authority to charge higher rates for its natural gas delivery services will impact NWIGU member companies’ interests. NWIGU members have a direct and substantial interest in Avista’s request for authority to increase the rates charged its natural gas sales and transportation customers for delivery services. No other party can adequately

represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.

5. 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.

6. 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.

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: May 4, 2005.

Respectfully submitted,



Edward A. Finklea  
Chad M. Stokes  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-mail: efinklea@chbh.com

Of Attorneys for the  
Northwest Industrial Gas Users

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing **NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE** upon the following parties of record:

Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

Simon ffitc  
Office of the Attorney General  
Public Counsel  
900 4<sup>th</sup> Avenue, Ste 2000  
Seattle, WA 98164

David J. Meyer, Esq.  
VP and Chief Counsel for  
Regulatory and Governmental Affairs  
Avista Corporation  
PO Box 3727  
1411 E. Mission Ave., MSC-13  
Spokane, WA 99220-3727

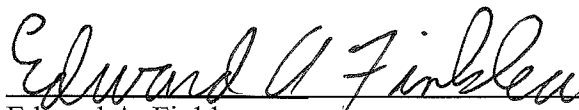
Kelly O. Norwood  
VP, State & Federal Regulation  
Avista Corporation  
PO Box 3727  
1411 E. Mission Ave., MSC-7  
Spokane, WA 99220-3727

Christopher Swanson  
Assistant Attorney General  
Utilities and Transportation Division  
1400 S. Evergreen Park Drive SW  
PO Box 40128  
Olympia, WA 98504-0128

Gregory J. Trautman  
Assistant Attorney General  
Utilities and Transportation Division  
1400 S. Evergreen Park Drive SW  
PO Box 40128  
Olympia, WA 98504-0128

by mailing a copy properly addressed with first class postage prepaid.

Dated in Portland, Oregon this 4<sup>th</sup> day of May, 2005.



Edward A. Finklea

Chad Stokes

Cable Huston Benedict Haagensen & Lloyd LLP

1001 SW 5<sup>th</sup> Avenue, Suite 2000

Portland, OR 97204-1136

Telephone: (503) 224-3092

Facsimile: (503) 224-3176

E-mail: [efinklea@chbh.com](mailto:efinklea@chbh.com)

[cstokes@chbh.com](mailto:cstokes@chbh.com)

Of Attorneys for the Northwest Industrial Gas Users