


CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP • ATTORNEYS

CHAD M. STOKES

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January 8, 2008

**VIA FEDERAL EXPRESS
AND ELECTRONIC FILING**

Carol Washburn
Executive Secretary
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: In the Matter of the Joint Application of PUGET HOLDINGS LLC, and
PUGET SOUND ENERGY, INC., for an Order Authorizing Proposed
Transaction.
Docket No. U-072375

Dear Ms. Washburn:

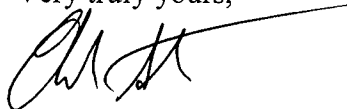
This letter submits for filing the original and twelve copies of the following two documents:

- 1) **Northwest Industrial Gas Users' Petition to Intervene**, and
- 2) **Notice of Appearance on Behalf of the Northwest Industrial Gas Users**

These documents have also been transmitted to you via electronic mail in PDF format. Paper copies will be mailed to all on the WUTC's current Service List.

Thank you for your assistance.

Very truly yours,



Chad M. Stokes

CMS:tr

Enclosure(s)

cc: Official Service List

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of) DOCKET NO. U-072375
)
PUGET HOLDINGS LLC,)
)
and) NORTHWEST INDUSTRIAL GAS
) USERS' PETITION TO INTERVENE
)
PUGET SOUND ENERGY, INC.,)
)
For an Order Authorizing Proposed)
Transaction.)
_____)

1. 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:

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

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

3. 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 Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: efinklea@cablehuston.com
cstokes@cablehuston.com

Don 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

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-five 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, Inc., ("PSE" or the "Company").
6. On December 17, 2007, Puget Holdings LLC ("Puget Holdings") and PSE submitted for filing a request for authorization to transfer the ownership and control of Puget Energy and its wholly owned subsidiary, PSE, to Puget Holdings. Under the proposed transaction, PSE will continue to be subject to the regulatory authority of the Washington Utilities and Transportation

Commission (“Commission”) and the Federal Energy Regulatory Commission (“FERC”). The Commission will hear this matter on shortened notice under WAC 480-07-440(1)(a).

7. The proposed transfer of ownership and control of PSE and its parent company may impact the interests of NWIGU member companies. NWIGU members therefore have a direct and substantial interest in this proceeding. 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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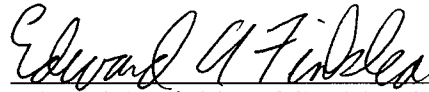
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10. WHEREFORE, based upon the foregoing, NWIGU respectfully requests leave to intervene as a party in these proceedings, with all of the procedural and substantive rights associated with full party status as described in WAC §480-07-340.

Dated: January 8, 2008.

Respectfully submitted,



Edward A. Finklea, OSB 84216
Chad M. Stokes, WSB 37499, OSB 00400
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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 these proceedings by mailing a copy properly 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 Tom.deboer@pse.com	The Kroger Co. Attn: Corporate Energy Manager 1014 Vine Street Cincinnati, OH 45202 dgeorge@kroger.com
Sheree Carson Jason Kuzma Perkins Coie Representing Puget Sound Energy, Inc. 10885 NE Fourth St., Ste 700 Bellevue, WA 98004 scarson@perkinscoie.com jkuzma@perkinscoie.com	Robert D. Cedarbaum Don Trotter WUTC - Attorney General Office State Mail Stop 40128 Olympia, WA 98504 bcedarba@wutc.wa.gov dtrotter@wutc.wa.gov
Simon ffitch, AAG Office of the Attorney General Public Counsel 800 Fifth Avenue, Ste. 2000 Seattle, WA 98104-3188 simonf@atg.wa.gov	Christopher Leslie Puget Holdings, LLC Representing Puget Holding, LLC 125 West 55 th Street, FL 22 New York, NY 10019 Chris.leslie@macquarie.com
Quality Food Centers, Inc. 10116 NE 8 th Street Bellevue, WA 98004	Fred Meyer Stores, Inc. 3800 Southeast 2 nd Street Portland, OR 99202
Norman Furuta, Associate Counsel Department of the Navy Representing Federal Executive Agencies 1455 Market Street, Ste. 1744 San Francisco, CA 94103-1399 Norman.furuta@navy.mil	Scott Johansen, Associate Counsel Department of the Navy Representing Federal Executive Agencies 1220 Pacific Highway San Diego, CA 92132 Scott.johansen@navy.mil

Michael L. Kurtz, Attorney Boehm, Kurtz, & Lowry Representing the Kroger Co. 36 E. Seventh St. Ste 1510 Cincinnati, OH 45202 mkurtz@bkllawfirm.com	Martha Brandon PO Box 10369 Bainbridge Island, WA 98110 mebrandon@qwest.net
Marv Cypert 4137 Shincke Rd. Olympia, WA 98506	Bill Parker 9512 232 nd Street SW Edmonds, WA 98020
Roland Strolis 13002 Northeast 101 st Place Kirkland, WA 98033 vidor@nwlink.com	Patricia Woehrlin 717 15 th Street Bellingham, WA 98225
Sally Brown WUTC - Assistant Attorney General Attorney General Section State Mail Stop 40128 Olympia, WA 98504 sjohnston@wutc.wa.gov	

Dated in Portland, Oregon this 8th day of January, 2008.



Edward A. Finklea, OSB 84216
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