

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

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STATE OF WASH  
UTIL. AND TRANS  
COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET UG-060256
	)	
Complainant,	)	
	)	
v.	)	THE ENERGY PROJECT'S
	)	PETITION TO INTERVENE
CASCADE NATURAL GAS CORPORATION,	)	
	)	
Respondent.	)	
.....	)	

COMES NOW, Petitioner The Energy Project, by and through its undersigned legal counsel, and pursuant to WAC 480-07-355, and that Notice of Prehearing Conference issued by this Commission on March 21, 2006, respectfully petitions for the right to intervene as a party to the above-captioned proceeding, with all rights and responsibilities appurtenant thereto.

- Pursuant to WAC 480-07-355(c), Petitioner offers the following information:
- (i) The Petitioner's name and address is The Energy Project, 1701 Ellis St., Bellingham, WA., 98225;
  - (ii) The Energy Project is a non-profit organization that for roughly the past twelve years has advocated statewide on behalf of community action agencies for programs that help to provide affordable access to essential home energy services for low-income households. Among others, The Energy Project represents the interests of The Opportunities Industrialization Center of Washington ("OIC"), a community action agency

located at 815 Fruitdale Blvd., Yakima, WA., 98902-1467. OIC, and the low-income individuals it assists, are located in Cascade Natural Gas' service territory. OIC has unique knowledge and experience through providing services to low-income households. The Energy Project has previously intervened in numerous other proceedings before this Commission. The Energy Project has partnered with the Washington State Community Action Program and the Washington Department of Commerce, Trade and Economic Development.

The Energy Project has a special interest in this proceeding because of the magnitude of the proposed rate increase and the particularly significant impact that it would have on low-income customers. The Energy Project is particularly interested in maintaining energy assistance and energy efficiency programs that could mitigate the impact of the proposed rate increases for low-income households.

For the reasons listed above, the intervention of The Energy Project in this proceeding is in the public interest. The Energy Project requests that the Commission grant its petition to intervene in this matter.

(iii) Though Petitioner has not yet had ample opportunity to fully assess all matters in controversy and formulate a precise position on such matters, Petitioner generally takes the position that the rate increase is unjustified in magnitude, will increase the number of households unable to afford natural gas service, reduce the number of households that agencies providing assistance (including, *inter alia*, weatherization measures) to Cascade's customers will be able to assist, and reduce the effectiveness of the programs such agencies offer lower energy bills;

(iv) Petitioner does not believe that its involvement in this proceeding would unduly broaden the issues;

(v) Petitioner shall be represented in this matter by, and service of all documents shall be made to:

Brad M. Purdy  
Attorney at Law  
2019 N. 17<sup>th</sup> St.  
Boise, ID 83702  
208.384.1299: Land  
208.484.9980: Cell  
208.384.8511: Fax

Petitioner's attorney is simultaneously filing a Notice of Appearance in conformity with WAC 480-07-345(2).

DATED, this 6<sup>th</sup> day of April, 2006.

  
Brad M. Purdy  
Attorney for Petitioner

## CERTIFICATE OF SERVICE

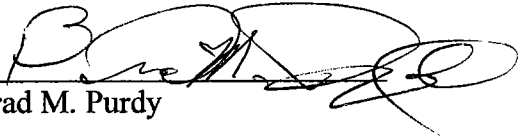
I HEREBY CERTIFY that on April 6, 2006, I caused to be served the foregoing THE ENERGY PROJECT'S PETITION TO INTERVENE upon all, as of yet identified, parties of record in these proceedings, as indicated below, by mailing a copy properly addressed with first class postage prepaid.

### SERVICE LIST

<b>JON T. STOLTZ</b> Senior Vice President Cascade Natural Gas Rates and Planning P.O. Box 24464 Seattle, WA 98124	<b>JAMES VAN NOSTRAND</b> Stoel Rives LLP 900 SW 5 <sup>th</sup> Avenue, Suite 2600 Portland, OR 97204 Attorneys for Cascade Natural Gas Corporation
<b>VINCENT J. DIAZ</b> 1095 Makah Place Fox Island, WA 98333	<b>GREG J. TRAUTMAN</b> Assistant Attorney General WUTC Attorney General's Office PO Box 40128 Olympia, WA 98504-0128 Attorney for WUTC
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Counsel for Northwest Industrial Gas Users

Dated THIS 6<sup>TH</sup> day of April, 2006.

  
Brad M. Purdy