

**CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP**

**ATTORNEYS AT LAW  
SUITE 2000  
1001 SW FIFTH AVENUE  
PORTLAND, OREGON 97204-1136**

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**TELEPHONE (503) 224-3092  
FACSIMILE (503) 224-3176**

CHAD M. STOKES

cstokes@chbh.com  
www.cablehuston.com

May 9, 2005

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol St NE #215  
PO Box 2148  
Salem, OR 97308-2148

Re: UG 163 – NW Natural Petition to Commence Investigation

Dear Filing Center:

Enclosed for filing is the Petition to Intervene of the Northwest Industrial Gas Users in the above-captioned proceeding.

Please call if you have any questions.

Very truly yours,



Chad M. Stokes

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 163**

In the Matter of	)
	)
NORTHWEST NATURAL GAS	) THE NORTHWEST INDUSTRIAL
COMPANY	) GAS USERS' PETITION TO
	) INTERVENE
Petition to Commence Investigation	)
	)
	)
	)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Northwest Industrial Gas Users (“NWIGU”) hereby submit this Petition to Intervene in the above-captioned proceeding and seek party status as provided in OAR § 860-011-0035(7). In support of this Petition, NWIGU states as follows:

1. The name and address of NWIGU as a party of record in this proceeding is:

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

Edward A. Finklea and Chad M. Stokes will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU’s attorneys at the following address:

Edward A. Finklea  
Chad M. Stokes  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., 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 non-profit association comprised of thirty two end users of natural gas with major facilities in the States of Oregon, Washington, 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 informational service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase transportation services from Williams Gas Pipeline – West, also known as Northwest Pipeline Corporation and TransCanada Gas Transmission Northwest Corporation, and purchase sales and transportation services from local distribution companies (“LDCs”), including Northwest Natural Gas Company (“NW Natural”) that acquire service from the interstate pipelines.
  
3. On March 31, 2005, NW Natural filed a Petition to Commence Investigation regarding its Distribution Margin Normalization or Conservation Tariff, also referred to as a partial decoupling mechanism (“decoupling mechanism”). The implementation of the decoupling mechanism as part of the Company’s overall revenue requirement and rate of return may impact the rates of all customers. Accordingly, as customers of NW Natural, NWIGU member companies have a direct and substantial interest in this proceeding. No other party can adequately represent NWIGU member companies’ interest and NWIGU will be affected by any Commission determination made in this proceeding.

4. NWIGU's participation in this proceeding will assist the Commission resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated: May 9, 2005

Respectfully submitted,



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Edward A. Finklea, OSB # 84216  
Chad M. Stokes, OSB # 00400  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., 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

## CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid.

JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org	PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST NE STE 1 SALEM OR 97301-3742 philip.h.carver@state.or.us
JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org	JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org
MICHAEL FIELDMAN COMMUNITY ACTION DIRECTORS OF OREGON 2448 W. HARVARD BLVD ROSEBURG OR 97470	BRIAN HIRSCHKORN AVISTA UTILITIES PO BOX 3727 SPOKANE WA 99220-3727 brian.hirschhorn@avistacorp.com
ROBERT JENKS CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org	DAVID J MEYER AVISTA CORPORATION PO BOX 3727 SPOKANE WA 99220-3727 david.meyer@avistacorp.com
C ALEX MILLER NORTHWEST NATURAL 220 NW 2ND AVE PORTLAND OR 97209 alex.miller@nwnatural.com	JANET L PREWITT DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us
JAMES M VAN NOSTRAND STOEL RIVES LLP 900 SW FIFTH AVE, STE 2600 PORTLAND OR 97204-1268 jmvannostrand@stoel.com	MICHAEL T WEIRICH DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 <u>michael.weirich@state.or.us</u>

STEVEN WEISS  
NORTHWEST ENERGY COALITION  
4422 OREGON TRAIL CT NE  
SALEM OR 97305  
steve@nwenergy.org

Dated in Portland, Oregon, this 9<sup>th</sup> day of May, 2005.



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Edward A. Finklea OSB # 84216  
Chad M. Stokes OSB #00400  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., 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)

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