## CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

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

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

CHAD M. STOKES

cstokes@chbh.com www.cablehuston.com

March 1, 2007

# VIA ELECTRONIC FILING & FIRST CLASS MAIL

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

Re:

UM 1302 – In the Matter of the Investigation into the Treatment of CO2 Risk in the Integrated Resource Planning (IRP) Process, the Northwest Industrial Gas Users' Petition to Intervene

Dear Filing Center:

Please find enclosed the original and one copy of the NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE in the above-referenced docket.

Thank you for your assistance. Should you have any questions regarding this matter, please feel free to contact me.

Very truly yours.

Chad M. Stokes

CMS/wc

cc: UM 1302 Service List (via email & first class mail)

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

## **UM 1302**

	1
In the Matter of the	)
PUBLIC UTILITY COMMISSION OF	<ul><li>) THE NORTHWEST INDUSTRIAL</li><li>) GAS USERS' PETITION TO</li></ul>
OREGON	) INTERVENE
	)
Investigation into the Treatment of CO2	)
Risk in the Integrated Resource Planning	)
(IRP) Process.	)
	)

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

Facsimile: (503) 636-0703 E-Mail: ppyron@nwigu.org

Edward A. Finklea and Chad M. Stokes from the law firm Cable Huston Benedict Haagensen and Lloyd 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 cstokes@chbh.com

- 2. NWIGU is a non-profit association comprised of thirty five 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 Oregon local distribution companies ("LDCs") that acquire service from the interstate pipelines.
- 3. The Oregon Public Utility Commission ("Commission") has commenced an investigation into the treatment of CO2 risk in the Integrated Resource Planning ("IRP") process. As customers of Oregon's gas LDC's, NWIGU member companies will be impacted by the treatment of CO2 risk in the IRP process. NWIGU therefore has a direct and substantial interest 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.

NWIGU participates in the IRP process for Oregon's gas utilities. Accordingly, 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: February 28, 2007

Respectfully submitted,

Edward A. Finklea

OSB No. 842163

Chad M. Stokes

OSB No. 004007

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

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.

LOWREY R. BROWN Citizens' Utility Board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205

ROBERT JENKS Citizens' Utility Board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205

MELINDA J. DAVISON Davison Van Cleve PC 333 SW Taylor, Suite 400 Portland, OR 97204

PHILIP H. CARVER Oregon Department of Energy 625 Marion Street NE, Suite 1 Salem, OR 97301-3742 JASON EISDORFER Citizens' Utility Board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205

IRION A. SANGER Davison Van Cleve PC 333 SW Taylor, Suite 400 Portland, OR 97204

JANET L. PREWITT Department of Justice 1162 Court Street NE Salem, OR 97301-4096

MAURY GALBRAITH Oregon Public Utility Commission PO Box 2148 Salem, OR 97308-2148 MICHELLE R. MISHOE Pacific Power & Light 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 OREGON DOCKETS
Pacificorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Dated in Portland, Oregon, this 28<sup>th</sup> day of February, 2007.

Edward A. Finklea Chad M. Stokes

OSB No. 842163

ces OSB No. 004007

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

cstokes@chbh.com

Of Attorneys for the Northwest Industrial Gas Users