

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 46

In the Matter of the)	
)	
CASCADE NATURAL GAS)	THE NORTHWEST INDUSTRIAL
CORPORATION)	GAS USERS' PETITION TO
)	INTERVENE and Waiver of Paper
2008 Integrated Resource Plan)	Service
)	

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

Chad M. Stokes and Tommy A. Brooks 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:

Chad M. Stokes
Tommy A. Brooks
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

2. NWIGU is a non-profit association comprised of thirty-eight 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 Northwest Pipeline GP and TransCanada Gas Transmission Northwest Corporation, and purchase sales and transportation services from Oregon local distribution companies (“LDCs”), including Cascade Natural Gas Corporation (“Cascade”), that acquire service from the interstate pipelines.

3. On December 15, 2008, Cascade filed its 2008 Integrated Resource Plan, which will guide future natural gas resource acquisitions and commitments by Cascade. As customers of Cascade, NWIGU member companies will be impacted by decisions made by Cascade as guided by the IRP process. NWIGU therefore has 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 has participated in past IRP processes for Oregon’s gas utilities. Accordingly, NWIGU’s participation in this proceeding will assist the Commission in resolving

the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

5. NWIGU waives paper service of documents in this proceeding.

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

Dated this 5th day of February, 2009.

Respectfully submitted,

/s/ Chad M. Stokes

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston

1001 SW Fifth Ave., Suite 2000

Portland, OR 97204-1136

Telephone: (503) 224-3092

Facsimile: (503) 224-3176

E-Mail: cstokes@cablehuston.com

tbrooks@cablehuston.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 via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

**PUBLIC UTILITY COMMISSION
OF OREGON**
LYNN KITTILSON
PO BOX 2148
SALEM OR 97308-2148
lynn.kittilson@state.or.us

CASCADE NATURAL GAS
KATHERINE BARNARD
DIRECTOR-REGULATORY AFFAIRS
PO BOX 24464
SEATTLE WA 98124
kbarnard@cngc.com

Dated in Portland, Oregon, this 5th day of February, 2009.

/s/ Chad M. Stokes
Chad M. Stokes, OSB No. 004007
Tommy A. Brooks, OSB No. 076071
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users