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January 13, 2012

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: In the Matter of Northwest Natural Gas Company –
Application for a General Rate Revision
Docket No. UG-221

Dear Filing Center:

Enclosed please find the original and one (1) copy of the NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE and WAIVER OF PAPER SERVICE in the above-referenced docket.

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

Very truly yours,



Tommy A. Brooks

TAB:sk
Enclosures

cc: UG-221 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 221

In the Matter of)
) THE NORTHWEST INDUSTRIAL
NORTHWEST NATURAL GAS) GAS USERS' PETITION TO
COMPANY) INTERVENE and Waiver of Paper
) Service
Application for a General Rate Revision)
)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), 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 § 860-001-0300(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 & 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
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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 sales and transportation services from Oregon local distribution companies (“LDCs”), including Northwest Natural Gas Company (“NW Natural”), that acquire service from interstate pipelines.

3. On December 30, 2011, NW Natural filed an application seeking a general rate revision that proposes to increase rates \$43.7 million (6.2%). As customers of NW Natural, NWIGU member companies will be impacted by any outcome in this proceeding. 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’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. Specifically, NWIGU will be able to advise the Commission on issues including, but not limited to, cost of service, rate spread, rate design, revenue requirement, and return on equity.

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

6. NWIGU is also filing a Notice of Intent to Request Intervenor Funding concurrently with this Petition to Intervene.

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

Dated this 13th day of January 2012.

Respectfully submitted,

/s/ Tommy A. Brooks

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

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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.

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Community Action Partnership of Oregon

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Dated in Portland, Oregon, this 13th day of January 2012.

/s/ Tommy A. Brooks

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