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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: Cascade Natural Gas Corporation's 2011 Integrated Resource Plan
Docket No. LC-54

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: LC 54 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 54

| | | |
|-------------------------------|---|-------------------------------|
| In the Matter of the |) | |
| |) | |
| CASCADE NATURAL GAS |) | THE NORTHWEST INDUSTRIAL |
| CORPORATION |) | GAS USERS' PETITION TO |
| |) | INTERVENE and Waiver of Paper |
| 2011 Integrated Resource Plan |) | Service |
| |) | |

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
Telephone: (503) 224-3092
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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 transportation services from Northwest Pipeline GP and TransCanada's Gas Transmission Northwest LLC, 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 January 3, 2012, Cascade filed its 2011 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, including Cascade. 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 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.

**PUBLIC UTILITY COMMISSION
OF OREGON**

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CASCADE NATURAL GAS

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

/s/ Tommy A. Brooks

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