H CABLE HUSTON CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP + ATTORNEYS

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November 1, 2013

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission Attn: Filing Center 3930 Fairview Industrial Drive SE PO Box 1088 Salem, OR 97308

> Re: In the Matter of Northwest Natural Gas Company dba NW Natural: Investigation into Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider **Docket No. UG 266**

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 266 Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG-266

In the Matter of

NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL

Investigation into Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider.

NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300(2), and the Prehearing Conference Memorandum issued on October 31, 2013, Northwest Industrial Gas Users ("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(7). In support of this Petition to Intervene, NWIGU states as follows:

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

Edward A. Finklea Executive Director Northwest Industrial Gas Users 326 Fifth Street Lake Oswego, Oregon 97034 Telephone: (503) 303-4061 Facsimile: (503) 303-4941 E-Mail: efinklea@nwigu.org

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston Benedict Haagensen & Lloyd LLP will represent NWIGU in this proceeding. In addition to Edward A. Finklea, 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 more than 40 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, aerospace, and healthcare providers. 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 like NW Natural.

3. On June 27, 2013, NW Natural Company d/b/a NW Natural ("NW Natural") filed its revisions and additions to its Tariff P.U.C. Or. 25. NWIGU provided comments to the Commission before this matter was suspended. NWIGU's members, as purchasers of natural gas and customers of NW Natural, have a direct interest in NW Natural's proposal to provide the proposed service and no other party can adequately represent those interests.

- 4. NWIGU waives paper service of documents in this proceeding.
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WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the

rights of a party in this proceeding.

Dated this 1st day of November 2013.

Respectfully submitted,

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: <u>cstokes@cablehuston.com</u> tbrooks@cablehuston.com

Of Attorneys for the Northwest Industrial Gas Users

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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.

Citizens' Utility Board of Oregon

Robert Jenks G. Catriona McCracken 610 SW Broadway, Suite 400 Portland, Oregon 97205 <u>dockets@oregoncub.org;</u> <u>bob@oregoncub.org;</u> catriona@oregoncub.org

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Northwest Natural

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PUC Staff – Dept of Justice Stephanie Andrus

1162 Court Street, NE Salem, Oregon 97301-4096 Stephanie.andrus@state.or.us

Clean Energy Fuels Corp

Todd Campbell 4675 MacArthur Court, Suite 800 Newport Beach, CA 92660 tcampbell@cleanenergyfuels.com

Dated in Portland, Oregon, this 1st day of November 2013.

ATT

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

Of Attorneys for the Northwest Industrial Gas Users