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December 28, 2012

## VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket UM 1633

Attention Filing Center:

Enclosed in the above-referenced docket is an original and one copy of NW Natural's Petition to Intervene. The filing has been served on the parties to the service list as indicated on the attached Certificate of Service.

Please contact this office with any questions.

Wendy Mc Indoo

Very truly yours,

Wendy Memdoo

cc: Service List

| 1   | BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON   |   |  |
|---|--|---|--|
| 2   | UM 1633  |   |  |
| 3   |  |   |  |
| 4   | In the Matter of   |   |  |
| 5   | OREGON PUBLIC UTILITY COMMISSION,  | NORTHWEST NATURAL GAS COMPANY'S PETITION    |  |
| 6   | Investigation into Treatment of Pension Costs in Utility Rates.                            | TO INTERVENE and Waiver of Paper Service    |  |
| <i>'</i>  |  |   |  |
| 8   | Pursuant to ORS 756.525 and OAR 860  | 0-001-0300, Northwest Natural Gas Company   |  |
|   | ("NW Natural" or "the Company") petitions the Public Utility Commission of Oregon (the     |   |  |
| 11  | 1 "Commission") to intervene in this proceeding with full party status. In support of this |   |  |
|   | 2 petition, NW Natural states:   |   |  |
| 13  | 1.   |   |  |
| 14  | tural rea public utility operating in the state of Oregon and is                           |   |  |
| 15  | 5 subject to the supervision and regulation of the Commission.                             |   |  |
| 16  | 2  |   |  |
| 17  | Land of the Company are:   |   |  |
| Northwest Natural Gas Company 220 NW Second Ave |  |   |  |
| 19  | Portland, OR 97209   |   |  |
| 20  |  | 3.  |  |
| 21  |  | ervice in this docket. Communications to NW |  |
|   | 2 Natural concerning this proceeding should be addressed to:                               |   |  |
| 23  | } Liea Rackner   | Mark Thompson                               |  |
| 24  | McDowell Rackner & Gibson PC   | NW Natural<br>Manager, Rates and Regulatory |  |
| 25  | Portland, OR 97205-2605  | 220 NW Second Ave.<br>Portland, OR 97209    |  |
| 26  | email: dookete@mea.is  | email: mark.thompson@nwnatural.com          |  |
| 20  | ,  |   |  |

| 1  | Rates and Regulatory Affairs  |   |  |
|----|---|---|--|
| 2  | NW Natural 220 NW Second Ave.   |   |  |
| 3  | Portland, OR 97209  |   |  |
| 4  | email: efiling@nwnatural.com  |   |  |
| 5  | .9  | 4.  |  |
| 6  | NW Natural has a direct and subst   | tantial interest in this proceeding. NW Natural has |  |
| 7  | experience with Commission investigation  | ns. NW Natural's participation in this docket could |  |
| 8  | assist the Commission in resolving the issues. NW Natural will not unreasonably broaden |   |  |
| 9  | the issues, burden the record, or unreasonably delay the proceedings.                   |   |  |
| 10 |   | 5.  |  |
| 11 | Because no other party can adequately represent NW Natural's interests in this          |   |  |
| 12 | proceeding, NW Natural respectfully requests that the Commission grant this Petition to |   |  |
| 13 | Intervene.  |   |  |
| 14 |   |   |  |
| 15 | DATED: December 28, 2012.   | McDowell Rackner & Gibson PC                        |  |
| 16 |   | hisalan   |  |
| 17 |   | Lisa F. Rackner                                     |  |
| 18 |   | NORTHWEST NATURAL GAS COMPANY                       |  |
| 19 |   | Mark Thompson<br>Manager, Rates and Regulatory      |  |
| 20 |   | 220 NW Second Ave<br>Portland, OR 97209             |  |
| 21 |   | Attorneys for NW Natural                            |  |
| 22 |   |   |  |
| 23 |   |   |  |
| 24 |   |   |  |
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| 26 |   |   |  |

## CERTIFICATE OF SERVICE

| 1  | CERTIFICATE OF SERVICE  |   |  |
|----|---|---|--|
| 2  | I hereby certify that I served a true and correct copy of the foregoing document in Docket UN |   |  |
| 3  | 1633 on the following named person(s) on the  | date indicated below by email addressed to said                                 |  |
| 4  | person(s) at his or her last-known address(es) indicated below.                               |   |  |
| 5  | David J. Meyer<br>Avista Corporation  | Elizabeth Andrews<br>Avista Utilities   |  |
| 6  | David.meyer@avistacorp.com  | Liz.andrews@avistacorp.com  |  |
| 7  | Patrick Ehrbar<br>Avista Utilities<br>Pat.ehrbar@avistacorp.com                               | Tommy A. Brooks Cable Huston Benedict Haagensen & Lloyd tbrooks@cablehuston.com |  |
| 9  | G. Catriona McCracken Citizens' Utility Board of Oregon catriona@oregoncub.org                | Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd cstokes@cablehuston.com  |  |
| 10 | calliona@oregoricub.org   |   |  |
| 11 | Bob Jenks<br>Citizens' Utility Board of Oregon  | OPUC Dockets Citizens' Utility Board Of Oregon                                  |  |
| 12 | bob@oregoncub.org   | dockets@oregoncub.org   |  |
| 13 | Lisa D. Nordstrom Idaho Power Company   | Regulatory Dockets Idaho Power Company dockets @idahopoer.com                   |  |
| 14 | Inordstrom@idahopower.com   | dockets @idanopoor.com  |  |
| 15 | R. Bryce Dalley<br>Pacific Power  | Sarah Wallace Pacific Power   |  |
| 16 | bryce.dalley@pacificorp.com   | Sarah.wallace@pacificorp.com  |  |
| 17 | Oregon Dockets Pacificorp, DBA Pacific Power oregondockets@pacificorp.com                     | Randy Dahlgren Portland General Electric Pge.opuc.filings@pgn.com               |  |
| 18 |   | Nicholas Cimmiyotti   |  |
| 19 | Portland General Electric doug.tingey@pgn.com   | Public Utility Commission of Oregon Nick.cimmiyotti@state.or.us                 |  |
| 20 |   |   |  |
| 21 | PUC Staff – Department of Justice<br>Jason.w.jones@state.or.us                                |   |  |
| 22 |   |   |  |
| 23 |   |   |  |
| 24 |   | Wendy Madndow Wendy McIndoo Office Manager                                      |  |
| 25 | Ī   | Wendy McIngo  |  |
| 26 |   | Office Manager  |  |