

TOMMY A. BROOKS

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June 19, 2013

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, dba NW Natural

Investigation of Interstate Storage and Optimization Sharing

Docket No. UM-1654

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Northwest Industrial Gas Users' Petition to Intervene 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:

UM-1654 Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1654

In the Matter of

NORTHWEST NATURAL GAS COMPANY dba NW NATURAL

Investigation of Interstate Storage and Optimization Sharing

NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, 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). The prehearing conference in this matter has already occurred, but no deadline was set at that time for petitions to intervene. As noted in the Prehearing Conference Memorandum dated June 17, 2013, a party may intervene at any time before the close of the record. 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 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

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- 2. NWIGU is a non-profit association comprised of more than forty 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. 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").
- 3. NW Natural initiated this docket in part as a result of Commission Order No. 12-408 entered on October 26, 2012. As part of that order, which the Commission issued in Docket UG 221 addressing NW Natural's general rate case, the Commission ordered additional proceedings to address unresolved issues relating to interstate gas storage and optimization.
- 4. NWIGU participated as a party in UG 221. NWIGU's participation in this proceeding will continue to 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.
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WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 19th day of June, 2013.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston

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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.

Citizens Utility Board (W)

Robert Jenks G. Catriona McCracken OPUC Dockets 610 SW Broadway, Suite 400 Portland, OR 97205 bob@oregoncub.org; catriona@oregoncub.org; dockets@oregoncub.org

Northwest Natural

Mark R. Thompson 220 NW 2d Avenue Portland, OR 97209 mark.thompson@nwnatural.com efiling@nwnatural.com

McDowell Rackner & Gibson, PC

Lisa F. Rackner 419 SW 11th Ave., Suite 400 Portland, OR 97205 dockets@mcd-law.com

Public Utility Commission

Erik Colville PO Box 2148 Salem, OR 97308-2148 erik.colville@state.or.us

PUC Staff – Department of Justice

Jason W. Jones **Business Activities Section** 1162 Court Street, NE Salem, OR 97301-4096 jason.w.jones@state.or.us

Dated in Portland, Oregon, this 19th day of June, 2013.

Chad M. Stokes, OSB No. 004007 Tommy A. Brooks, OSB No. 076071

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