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December 1, 2014

VIA ELECTRONIC FILING & U.S. MAIL

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

Re: In the Matter of Northwest Natural Gas Company dba NW Natural
Request for Determination of the Prudence of Environmental Remediation Costs
Docket No. UM 1706

Dear Filing Center:

Enclosed please find the original and one (1) copy of 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,



Chad M. Stokes

CMS:sk
Enclosures

cc: UM 1706 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1706

In the Matter of

NORTHWEST NATURAL, dba NW
NATURAL,

Request for Determination of the
Prudence of Environmental Remediation
Costs for the Calendar Year 2013 and the
First Quarter of 2014

NORTHWEST INDUSTRIAL GAS
USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300(2), 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 LLP will represent NWIGU in this proceeding. In addition to Mr. 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 LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
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2. NWIGU is a non-profit association comprised of approximately 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 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 ("LDCs"), including Northwest Natural Gas Company ("NW Natural").

3. Schedule 183, was authorized by Commission Order 12-408 (Docket No. UG-221) to amortize balances in the Site Remediation Recovery Mechanism related to environmental site remediation costs. As required by Schedule 183, NW Natural initiated this docket to address prudence of its environmental remediation expenses from January 1, 2013 through March 31, 2014.

4. NWIGU participated as a party in UG 221 and UM 1635 and provided expert testimony and argument with respect to NW Natural's environmental remediation costs. 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. Staff, CUB and NW Natural do not object to NWIGU's late intervention.

6. 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 1st day of December 2014.

Respectfully submitted,



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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

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Dated in Portland, Oregon, this 1st day of December, 2014.



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