

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1717

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba NW NATURAL,

Application for Prudence Review of Costs
of Post-Carry Wells

NORTHWEST INDUSTRIAL GAS
USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300(2), and Northwest Natural Gas Company's ("NW Natural") Application for Prudence Review of Costs of Post-Carry Wells, dated February 26, 2015, the 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
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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:

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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 Northwest Natural Gas Company (“NW Natural”).

3. On February 26, 2015, NW Natural filed an application for a prudence review of the costs associated with NW Natural’s decision to invest in 7 wells in the Jonah Field. NW Natural did so based on a joint venture it entered into with Encana Oil and Gas (USA), Inc., which sold and transferred its interest to Jonah Energy, LLC. Currently, the 7 wells appear to have underperformed and the opportunity to invest in other post-carry wells does not appear attractive under the market conditions that exist today.

4. As customers of NW Natural, NWIGU member companies will be impacted by any outcome in this proceeding. NWIGU therefore has a direct and substantial interest in this proceeding. No other party can adequately represent those interests.

5. 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.

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 6th day of March 2015.

Respectfully submitted,



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Of Attorneys for the
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