

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1909

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation of the Scope of the
Commission's Authority to Defer Capital
Costs.

NORTHWEST INDUSTRIAL GAS
USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525 and 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. 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
545 Grandview Drive
Ashland, OR 97520
Phone: (541) 708-6338
Facsimile: (541) 708-6339
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:

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Chad M. Stokes
Tommy A. Brooks
Cable Huston LLP
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 approximately 38 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 including Northwest Natural Gas Company (NW Natural), Avista Utilities (Avista), and Cascade Natural Gas Corporation (Cascade).

3. Based on Staff's recommendation, the Commission has opened an investigation on the Commission's legal authority to defer capital costs under ORS 757.259(2)(e). As the Commission's order opening this docket acknowledges, this generic proceeding will impact NW Natural, Avista, and Cascade. The Commission's authority and approval of deferred costs under ORS 757.259(2)(e) has a direct impact on customer rates and, therefore, will impact NWIGU's members.

4. 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. Specifically, NWIGU has internal and external expertise that will inform the

Commission both with respect to the Commission's authority and with respect to the impact of any Commission decision.

5. 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 4th day of January 2018.

Respectfully submitted,



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

Of Attorneys for
Northwest Industrial Gas Users