## BEFORE THE PUBLIC UTILITY COMMISSION

## OF OREGON

## **UM 1919**

In the Matter of

NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,

Application for Authorization to Defer Certain Expenses Associated with the 2018 US Tax Cuts and Jobs Act.

ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Alliance of Western Energy Consumers ("AWEC") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status. In support of this Petition to Intervene, AWEC states as follows:

1. The name and address of AWEC as a party of record in this proceeding is:

Edward A. Finklea Director of Natural Gas Alliance of Western Energy Consumers 545 Grandview Drive Ashland, OR 97520

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Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP will represent AWEC in this proceeding. In addition to Mr. Finklea, all documents related to this proceeding should be served on AWEC's attorneys at the following address:

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- 2. AWEC f/n/a Northwest Industrial Gas Users 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. AWEC 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. AWEC member companies purchase sales and transportation services from Oregon local distribution companies including Northwest Natural Gas Company ("NW Natural").
- 3. NW Natural filed an application for authorization to defer certain expenses or revenues associated with the Tax Cuts and Jobs Act ("TCJA") pursuant to 757.259 and OAR 860-27-0300. AWEC did not intervene because it was AWEC's intent to address the tax reform in the NW Natural general rate proceeding, UG-344. Now that UG 344 has concluded, there are still issues related to the TCJA that need to be resolved. To the extent the remaining tax issues are addressed in this docket and not UG 344, the Commission's decision in this matter will have a direct impact on customer rates and, therefore, will impact AWEC's members.

- 4. To the extent the remaining TCJA issues are addressed in this proceeding,
  AWEC'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.
- 5. WHEREFORE, AWEC respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 31st day of October 2018.

Respectfully submitted,

All St

Chad M. Stokes, OSB No. 004007

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