BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1927

In the Matter of

CASCADE NATURAL GAS CORPORATION,

ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE

Application for Deferral of 2018 Net Benefits Associated with the US Tax Cuts and Jobs Act.

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 Phone: (541) 708-6338 Facsimile: (541) 708-6339 E-Mail: efinklea@awec.solutions

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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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. AWEC 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 Cascade Natural Gas Corporation (Cascade).

3. Cascade filed an application for authorization to defer for later rate-making treatment the expected net benefits associated with the Tax Cuts and Jobs Act ("TCJA") pursuant to 757.259 and OAR 860-27-0300. While AWEC believes that the issues surrounding the tax reform should be addressed in Cascade's general rate proceeding, UG 347, Cascade does not agree. To the extent the Commission decides some of the issues arising from the TCJA in this proceeding, it will have a direct impact on customer rates and, therefore, will impact AWEC's members.

4. 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.

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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 At

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Of Attorneys for Alliance of Western Energy Consumers

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