

March 29, 2005

VIA EMAIL AND U.S. Mail

Kathryn Logan Administrative Law Judge Administrative Hearings Division Oregon Public Utility Commission 550 Capitol Street NE, Suite 215 Salem, OR 97301-2551 kathryn.logan@state.or.us

> Re: In the Matter of an Investigation regarding Competitive Bidding (UM 1182) OPUC Docket No. UM1182

Enclosed for filing is an original plus five (5) copies of Cascade Natural Gas Corporation's Motion to Intervene Out of Time and Petition to Intervene in the above docket.

If there are any questions regarding this filing please contact me at (206) 381-6824.

Sincerely,

Katherine J. Barnard

Director, Regulatory Affairs

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

	UM1182
In the Matter of an Investigation regarding Competitive Bidding)) MOTION TO INTERVENE) OUT OF TIME)

Cascade Natural Gas Corporation (Cascade) hereby moves for permission to intervene out of time. Cascade's Petition to Intervene is attached to this Motion.

)

It has come to the Company's attention that specific issues relating to local gas distribution companies (LDC's) have been raised subsequent to the intervention date. These issues may directly impact the Company. Granting this petition for late intervention will not broaden the issues, burden the record or unreasonably delay the proceeding nor prejudice the rights of other parties to the proceeding. Cascade is a party to the companion case UM1056.

For the foregoing reason, Cascade Natural Gas Corporation respectfully requests that the Commission exercise its discretion to grant Cascade's Motion to Intervene Out of Time.

Dated: March 29, 2005

Respectfully submitted,

Jon T. Stoltz

Sr. Vice President-Regulatory & Gas Supply

Cascade Natural Gas Corporation

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

	UM1182
In the Matter of an Investigation regarding Competitive Bidding)) PETITION TO INTERVENE)

Pursuant to Oregon Administrative Rule 860-013-0021, Cascade Natural Gas Corporation (Cascade or the Company) petitions to intervene in this proceeding. In support of this Petition, Cascade provides the following:

a) The name and address of the Company is:

Cascade Natural Gas Corporation 222 Fairview Avenue North Seattle, WA 98109

b) The names and addresses of the persons to be included on the official service list in this proceeding are:

Jon T. Stoltz Sr. Vice President, Regulatory & Gas Supply Cascade Natural Gas Corporation 222 Fairview Avenue North Seattle, WA 98109 jstoltz@cngc.com

Katherine J. Barnard Director, Regulatory Affairs Cascade Natural Gas Corporation 222 Fairview Avenue North Seattle, WA 98109 kbarnard@engc.com

- c) Cascade is a public utility subject to the jurisdiction of the Commission.
- d) The Commission has opened an investigation to include parties other than the Commission in the discussion of Competitive Bidding requirements, leading to a policy order or proposed rule implementing policy changes regarding Competitive Bidding practices. The first issue identified on Staff's proposed issue list addresses whether or not the policy should apply to natural gas utilities. As an investor-owned natural gas distribution company serving portions of central and eastern Oregon, Cascade has an interest in this proceeding. Policies and decisions made by the Commission in this proceeding may directly affect Cascade.

- e) Cascade intends to raise issues appropriate to the proceeding.
- f) Because of Cascade's perspective as a regulated, investor-owned utility, Cascade can assist the Commission in resolving the issues herein.

Accordingly, the Company's Petition to Intervene should be granted.

Dated this 29th day of March 2005.

Respectfully submitted,

Jon T. Stoltz

Sr. Vice President-Regulatory & Gas Supply

Cascade Natural Gas Corporation

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing CASCADE NATURAL GAS

CORPORATION'S PETITION TO INTERVENE in OPUC Docket No. UM1182

by mailing a copy by First Class U.S. Mail, postage prepaid and properly addressed, to the persons shown on the attached Service List.

Dated this 29th day of March, 2005

Catherine J. Barnard

Director, Regulatory Affairs Cascade Natural Gas Corporation

SERVICE LIST UM 1182

NW ENERGY COALITION RATES & REGULATORY AFFAIRS 219 FIRST ST STE 100 PORTLAND GENERAL ELECTRIC **RATES & REGULATORY AFFAIRS** SEATTLE WA 98104 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com SUSAN K ACKERMAN STEPHANIE S ANDRUS NIPPC DEPARTMENT OF JUSTICE PO BOX 10207 **REGULATED UTILITY & BUSINESS** PORTLAND OR 97296-0207 SECTION susan.k.ackerman@comcast.net 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us PHIL CARVER JASON EISDORFER **OREGON DEPARTMENT OF ENERGY** CITIZENS' UTILITY BOARD OF OREGON 625 MARION ST NE STE 1 610 SW BROADWAY STE 308 SALEM OR 97301-3742 PORTLAND OR 97205 philip.h.carver@state.or.us iason@oregoncub.org ANN L FISHER ANN ENGLISH GRAVATT AF LEGAL & CONSULTING SERVICES RENEWABLE NORTHWEST PROJECT 1425 SW 20TH STE 202 917 SW OAK - STE 303 PORTLAND OR 97201 PORTLAND OR 97205 energlaw@aol.com ann@rnp.org DAVID E HAMILTON ROBERT D KAHN **NORRIS & STEVENS** NIPPC 621 SW MORRISON ST STE 800 7900 SE 28TH ST STE 200 PORTLAND OR 97205-3825 MERCER ISLAND WA 98040 davidh@norrstev.com rkahn@nippc.org **BARTON L KLINE** MONICA B MOEN IDAHO POWER COMPANY IDAHO POWER COMPANY PO BOX 70 PO BOX 70 BOISE ID 83707-0070 BOISE ID 83707-0070 bkline@idahopower.com mmoen@idahopower.com JANET L PREWITT LISA F RACKNER DEPARTMENT OF JUSTICE ATER WYNNE LLP 1162 COURT ST NE 222 SW COLUMBIA ST STE 1800 SALEM OR 97301-4096 PORTLAND OR 97201-6618 janet.prewitt@doj.state.or.us Ifr@aterwynne.com **V DENISE SAUNDERS** JOHN W STEPHENS PORTLAND GENERAL ELECTRIC **ESLER STEPHENS & BUCKLEY** 121 SW SALMON ST 1WTC1301 888 SW FIFTH AVE STE 700 PORTLAND OR 97204 PORTLAND OR 97204-2021 denise.saunders@pgn.com stephens@eslerstephens.com

STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org