

Rates and Regulatory Affairs
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March 30, 2005

Via email and U.S. Mail

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

Re: **DOCKET UM 1182: In the Matter of an Investigation Regarding
Competitive Bidding**

Motion to Intervene Out of Time and Petition to Intervene of
NW Natural

Enclosed please find an original and five copies (sent via U.S. mail) of NW Natural's Motion to Intervene Out of Time and Petition to Intervene in the above-referenced docket.

Please contact me if you have any questions.

Sincerely,

/s/ C. Alex Miller
C. Alex Miller
Director
Regulatory Affairs & Forecasting

enclosures

cc: UM 1182 Service List

3. The nature and extent of Petitioner's interest in the proceeding is as follows:

NW Natural is a natural gas local distribution company (LDC) that purchases, sells, and transports natural gas for over 500,000 customers via separate distribution systems in Oregon and Washington. NW Natural's system in Oregon is subject to the jurisdiction of the Commission and the Washington system is subject to the Washington Utilities and Transportation Commission's jurisdiction.¹

4. The issues Petitioner intends to raise at the proceeding:

After the deadline for timely interventions passed, NW Natural become aware that issues in this docket may directly pertain to natural gas utilities. *See*, item 1 of Staff's proposed issues list dated March 15, 2005. Given the potential application of the competitive bidding process being addressed in this docket to natural gas utilities, NW Natural has a direct interest in this proceeding and seeks Party status in order to participate in this docket. If this intervention is granted, NW Natural intends to respond to the issues list proposed by Staff by April 6, 2005. NW Natural submits that its participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See*, OAR 860-012-0001.

WHEREFORE, NW Natural respectfully requests that this Petition to Intervene as a Party be granted.

DATED: this 30th day of March, 2005

Respectfully submitted,

/s/ C. Alex Miller

C. Alex Miller

Director

Regulatory Affairs & Forecasting

¹ NW Natural is exempt from FERC jurisdiction under Sections 1(b) and 1(c) of the Natural Gas Act (NGA) for its systems, facilities, and services in Oregon and Washington. Portland Gas and Coke Company, 17 FPC 638 (1957); Natural Gas Pipeline Company of America, et al., 18 FERC ¶ 61,235 (1982).



CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2005, I served the foregoing MOTION TO INTERVENE OUT OF TIME and PETITION TO INTERVENE OF NW NATURAL IN OPUC DOCKET UM 1182 upon each party listed below by mailing a copy to the persons at the addresses on the official service list.

/s/ Kelley Miller
Kelley Miller
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OPUC DOCKET NO. UM 1182

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