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January 30, 2006

VIA ELECTRONIC FILING

Oregon Public Utility Commission Attn: Filing Center 550 Capitol Street, N.E., #215 P.O. Box 2148 Salem, Oregon 97308-2148

RE:

In the Matter of CASCADE NATURAL GAS requesting Authorization to establish a Decoupling Mechanism and approval of Tariff Sheets

No. 20 and No. 30-A **Docket No. UG 167**

Dear Filing Center:

Enclosed please find an original and one (1) copy of **The Northwest Industrial Gas Users' Petition to Intervene** in the above-referenced Docket UG 167.

This was filed electronically with the OPUC on this date, and will be served both electronically and by U.S. Mail on those parties listed on the OPUC's current Service List.

Thank you for your assistance.

Respectfully submitted,

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Edward A. Finklea

EAF/nh

cc: Current Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 167

| |) |
|---|----------------------------|
| In the Matter of |) |
| |) THE NORTHWEST INDUSTRIAL |
| CASCADE NATURAL GAS |) GAS USERS' PETITION TO |
| |) INTERVENE |
| requesting Authorization to establish a |) |
| Decoupling Mechanism and approval of |) |
| tariff sheets No. 30 and No. 30-A |) |
| |) |

Pursuant to ORS § 756.525 and OAR § 860-013-0021, the Northwest Industrial Gas Users ("NWIGU") hereby submit this Petition to Intervene in the above-captioned proceeding and seek party status as provided in OAR § 860-011-0035(5). In support of this Petition, NWIGU states as follows:

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

Paula E. Pyron Executive Director Northwest Industrial Gas Users 4113 Wolf Berry Court Lake Oswego, OR 97035-1827 Telephone: (503) 636-2580

Facsimile: (503) 636-0703 E-Mail: ppyron@nwigu.org Edward A. Finklea and Chad M. Stokes will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU's attorneys at the following address:

Edward A. Finklea Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd LLP 1001 SW Fifth Ave., Suite 2000 Portland, OR 97204-1136 Telephone: (503) 224-3092

Facsimile: (503) 224-3176 E-Mail: <u>efinklea@chbh.com</u> cstokes@chbh.com

- 2. NWIGU is a non-profit association comprised of thirty-two end-users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, and aerospace. The Association provides an informational service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase transportation services from Williams Gas Pipeline West, also known as Northwest Pipeline Corporation and Gas Transmission Northwest Corporation, and purchase sales and transportation services from local distribution companies ("LDCs") that acquire service from the interstate pipelines. NWIGU member companies acquire natural gas sales and transportation services from Cascade Natural Gas in Oregon.
- 3. In this proceeding, Cascade Natural Gas requests authorization to establish a deferred accounting type of decoupling mechanism whereby the Company would establish deferred accounts to track separately changes in margin revenue due to variations in weather normalized usage and changes in margin revenues due to weather that varies from normal. The deferred

accounts would track such variations for residential and commercial customers of Cascade.

However, all customers of the Company would be impacted as Cascade's risk profile will change

if the Commission approves the proposed deferred account-tracking mechanisms. The outcome

of this proceeding will therefore impact the rates paid by all Cascade customers in Oregon.

Accordingly, as customers of Cascade Natural Gas in Oregon, NWIGU member companies have

a direct and substantial interest this proceeding. No other party can adequately represent

NWIGU member companies' interest and NWIGU will be affected by any Commission

determination made in this proceeding.

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.

WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the

rights of a party in this proceeding.

Dated: January 30, 2006

Respectfully submitted,

Edward A. Finklea, OSB # 84216

Chad M. Stokes, OSB # 00400

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Of Attorneys for the

Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused to be served the foregoing **NORTHWEST**

INDUSTRIAL GAS USERS' PETITION TO INTERVENE on the attached Service List

obtained on January 30, 2006 from the Oregon Public Utility Commission's Website as follows:

- [XX] by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown on the attached Service List, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below;
- [XX] <u>and</u> by electronic mail ("e-mail") to those parties on the Oregon Public Utility Commission's Website Service List who listed an e-mail address.

SERVICE LIST

JON T STOLTZ SR VICE PRESIDENT--REGULATORY & GAS PO BOX 24464 SEATTLE WA 98124 jstoltz@cngc.com

DATED: This 30th day of January, 2006.

Edward A. Finklea

OSB # 84216

Chad M. Stokes

OSB #00400

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