

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1635

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW NATURAL

Mechanism for Recovery of
Environmental Remediation Costs

NORTHWEST INDUSTRIAL GAS
USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300(2), and the Notice of Prehearing Conference and Memorandum dated December 10, 2012, 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 § 860-001-0300(7). In support of this Petition to Intervene, NWIGU states as follows:

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

Edward A. Finklea
Executive Director
Northwest Industrial Gas Users
326 Fifth Street
Lake Oswego, Oregon 97034
Telephone: (503) 303-4061
Facsimile: (503) 303-4941
E-Mail: efinklea@nwigu.org

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston Benedict Haagensen & Lloyd will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU’s attorneys at the following address:

Chad M. Stokes
Tommy A. Brooks
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
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2. NWIGU is a non-profit association comprised of thirty-eight 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 sales and transportation services from Oregon local distribution companies (“LDCs”), including Northwest Natural Gas Company (“NW Natural”).

3. NW Natural initiated this docket in part as a result of Commission Order No. 12-437 entered on October 26, 2012. As part of that order, which the Commission issued in Docket UG 221 addressing NW Natural’s general rate case, the Commission ordered additional proceedings to address unresolved issues regarding the prudence of NW Natural’s environmental remediation costs, including the appropriate recovery mechanism for those costs.

4. NWIGU participated as a party in UG 221 and provided expert testimony and argument with respect to NW Natural’s environmental remediation costs. NWIGU’s participation in this proceeding will continue to assist the Commission in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

5. NWIGU waives paper service of documents in this proceeding.

6. NWIGU is also filing a Notice of Intent to Request an Issue Fund Grant concurrently with this Petition to Intervene.

WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 18th day of December 2012.

Respectfully submitted,



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Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

Citizens Utility Board (W)

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Northwest Natural

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Public Utility Commission

Judy Johnson
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judy.johnson@state.or.us

Dated in Portland, Oregon, this 18th day of December 2012.



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Of Attorneys for the
Northwest Industrial Gas Users


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December 18, 2012

VIA ELECTRONIC FILING & U.S. MAIL

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 Northwest Natural Gas Company dba NW Natural
Mechanism for Recovery of Environmental Remediation Costs
Docket No. UM 1635

Dear Filing Center:

Enclosed please find the original and one (1) copy of the NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE and WAIVER OF PAPER SERVICE in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please feel free to contact me.

Very truly yours,



Tommy A. Brooks

TAB:sk
Enclosures

cc: UM 1635 Service List