

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1722, UG 286**

In the Matters of

PUBLIC UTILITY COMMISSION OF  
OREGON,  
Investigation into Recovery of Safety  
Costs by Natural Gas Utilities (UM 1722)

and

NORTHWEST NATURAL GAS  
COMPANY dba NW NATURAL,  
Request to Continue Schedule 177, the  
System Integrity Program Recovery  
Mechanism (UG 286)

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 dated March 30, 2015, the Northwest Industrial Gas Users ("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks 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  
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Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP will represent NWIGU in this proceeding. In addition to Mr. Finklea, all documents related to this proceeding should be served on NWIGU's attorneys at the following address:

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2. NWIGU 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. NWIGU 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. NWIGU member companies purchase sales and transportation services from Oregon local distribution companies. .

3. In Order No. 15-093, the Commission adopted Staff's recommendation to suspend NW Natural's Advice No. 14-23, and open a generic investigation to examine the recovery of safety costs by natural gas utilities. NWIGU member companies purchase sales and transportation services from each gas utility in Oregon, and therefore has a direct and substantial interest 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.

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 2<sup>nd</sup> day of April 2015.

Respectfully submitted,



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Of Attorneys for the  
Northwest Industrial Gas User