

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UG 347**

In the Matter of

CASCADE NATURAL GAS  
CORPORATION,

Request for a General Rate Revision.

ALLIANCE OF WESTERN ENERGY  
CONSUMERS' PETITION TO  
INTERVENE

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Alliance of Western Energy Consumers ("AWEC") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status. In support of this Petition to Intervene, AWEC states as follows:

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

Edward A. Finklea  
Director of Natural Gas  
Alliance of Western Energy Consumers  
545 Grandview Drive  
Ashland, OR 97520  
Phone: (541) 708-6338  
Facsimile: (541) 708-6339  
E-Mail: efinklea@awec.solutions

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP will represent AWEC in this proceeding. In addition to Mr. Finklea, all documents related to this proceeding should be served on AWEC's attorneys at the following address:

///

///

Chad M. Stokes  
Tommy A. Brooks  
Cable Huston, LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: cstokes@cablehuston.com  
tbrooks@cablehuston.com

2. AWEC is a non-profit association representing a vast array of energy consumers, including more than 38 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. AWEC's 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. AWEC member companies purchase natural gas sales and transportation services from Oregon local distribution companies including Cascade Natural Gas Corporation ("Cascade" or "Company").

3. On May 31, 2018, Cascade filed an Application for General Rate Case Revision. Specifically, the Cascade is requesting a general rate increase in the Company's Oregon revenues of \$2,310,808. Because AWEC member companies purchase sales and transportation services from Cascade, AWEC has a direct and substantial interest in Cascade's application and, therefore, in this proceeding.

4. AWEC'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. Specifically, AWEC has internal and external expertise that will inform the

Commission regarding revenue requirement, rate spread, and rate design. AWEC can also help inform the Commission regarding issues raised by other parties.

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

Dated this 22nd day of June 2018.

Respectfully submitted,



---

Chad M. Stokes, OSB No. 004007  
Tommy A. Brooks, OSB No. 076071  
Cable Huston LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)  
[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)

Of Attorneys for  
Alliance of Western Energy Consumers