

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 71

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba NW NATURAL,

2018 Integrated Resource Plan.

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
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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:

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Chad M. Stokes
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2. AWEC is a non-profit association whose members are large energy consumers with major facilities in the States of Oregon, Washington, and Idaho. AWEC 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 sales and transportation services from Oregon local distribution companies including Northwest Natural Gas Company (NW Natural), Avista Utilities (Avista), and Cascade Natural Gas Corporation (Cascade).

3. NW Natural filed its Integrated Resource Plan (“IRP”) on August 24, 2018, in this docket. Because AWEC member companies purchase sales and transportation services from NW Natural, it has a direct and substantial interest in NW Natural’s IRP 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 both with respect to the Commission’s authority and with respect to the impact of any Commission decision.

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

Dated this 12th day of September 2018.

Respectfully submitted,



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