

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UG 388**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL

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  
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Ashland, OR 97520  
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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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Tommy A. Brooks  
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2. AWEC is a non-profit association with a membership consisting of more than 50 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. AWEC members include diverse industrial and commercial interests, including those related to 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, d/b/a NW Natural.

3. On December 30, 2019 NW Natural filed an Application to increase its natural gas rates for Oregon customers. NW Natural has requested a revenue requirement increase of \$71.4 million. Because AWEC member companies purchase sales and transportation services from NW Natural, AWEC has a direct and substantial interest in NW Natural'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 30<sup>th</sup> day of December 2019.

Respectfully submitted,



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Of Attorneys for  
Alliance of Western Energy Consumers