

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 2192**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL

Application for Approval of Deferred  
Accounting for TSA Security Directive 2  
Compliance Expenses

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  
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Chad M. Stokes 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  
Cable Huston LLP  
1455 SW Broadway, Suite 1500  
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Telephone: (503) 224-3092  
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2. AWEC is a non-profit association with a membership consisting of more than 40 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, and aerospace. 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 September 2, 2021 NW Natural filed an Application for Approval of Deferred Accounting for certain expenses related to Department of Homeland Security's Transportation Security Administration Security Directive Pipeline-2021-02. Because AWEC member companies purchase sales and transportation services from NW Natural, AWEC has a direct and substantial interest in NW Natural's request 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.

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

Dated this 18<sup>th</sup> day of October, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes".

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Chad M. Stokes, OSB No. 004007  
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Attorneys for  
Alliance of Western Energy Consumers