

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 2214**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL

Updated Depreciation Study.

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. Chad M. Stokes from the law firm Cable Huston LLP will represent AWEC in this proceeding, all documents related to this proceeding should be served at the following address:

Chad M. Stokes  
Cable Huston LLP  
1455 SW Broadway, Suite 1500  
Portland, OR 97201  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: cstokes@cablehuston.com

2. In addition to Mr. Stokes, all documents related to this proceeding should be served on AWEC's consultant, Bradley G. Mullins at the following address:

Bradley G. Mullins  
MW Analytics  
Vihiluoto 15  
Kempele, Finland FI-90440  
E-Mail: brmullins@mwanalytics.com

3. 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.

4. On December 17, 2021 NW Natural an updated Depreciation Study. 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.

5. 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.

6. 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 February 2022.

Respectfully submitted,



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