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December 6, 2005

**VIA ELECTRONIC FILING**

Oregon Public Utility Commission  
550 Capitol St. NE, #215  
PO Box 2148  
Salem, OR 97308-2148  
Attn: Filing Center

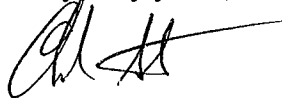
Re: UG 170 – In the Matter of OREGON PUBLIC UTILITY STAFF Directing  
NORTHWEST NATURAL GAS COMPANY to File Tariffs Establishing  
Automatic Adjustment Clauses

Dear Filing Center:

Please find enclosed for filing in the above-referenced docket the original and one copy of the Northwest Industrial Gas Users' Notice of Intent to Request an Issue Fund Grant.

Thank you for your assistance. Should you have any questions regarding this matter, please feel free to contact me.

Very truly yours,



Chad M. Stokes

cc: UG-170 Service List (via first class mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 170**

In the Matter of OREGON PUBLIC	)	
UTILITY COMMISSION STAFF directing	)	NORTHWEST INDUSTRIAL GAS
	)	USERS' NOTICE OF INTENT TO
NORTHWEST NATURAL to file tariffs	)	REQUEST AN ISSUE FUND
establishing automatic adjustment clauses	)	GRANT
under the terms of SB 408	)	
	)	

The Northwest Industrial Gas Users (“NWIGU”)<sup>1</sup> files this Notice of Intent to Request an Issue Fund Grant (“Notice of Intent”) in the above-captioned docket pursuant to OAR § 860-017-0050 and Article 6.2 of the Intervenor Funding Agreement (“IFA”).

1. The IFA was approved by the Oregon Public Utility Commission (“OPUC” or “Commission”) in Order No. 03-388 (July 2, 2003). NWIGU submits this Notice of Intent to notify the Commission of NWIGU’s intent to request intervenor funding in this Docket.

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<sup>1</sup> NWIGU is a nonprofit association comprised of thirty-two end users of natural gas with major facilities in the states of Oregon, Washington, and Idaho. NWIGU members include diverse industrial interests, including 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. NWIGU member companies purchase transportation services from Williams Gas Pipeline – West, also known as Northwest Pipeline Corporation (“NPC”), and from PG&E Gas Transmission, Northwest Corporation and purchase sales and transportation services from local distribution companies (“LDCs”), including NW Natural, Cascade and Avista, that acquire service from both pipelines.

2. Senate Bill 408 was passed by the 2005 Oregon Legislature and signed by the Governor. The new law requires Northwest Natural Gas Company (“NW Natural”), Portland General Electric (“PGE”), Pacific Power and Light (d/b/a “PacifiCorp”) and Avista Utilities (“Avista”) to file tax reports annually with the Commission. Beginning January 1, 2006, these tax reports may trigger an adjustment to customers’ bills if more tax liabilities were included in rates than the actual taxes paid by the relevant utility. To implement SB 408, the Commission has adopted temporary rules in Docket AR 498, and in Docket AR 499, permanent will be adopted. In addition, Staff has directed NW Natural to file tariffs establishing automatic adjustment clauses under SB 408. There are significant legal and policy issues that must be resolved in this proceeding.

3. UG 170 is an eligible proceeding under Article 1 (c) of the IFA. The IFA defines an eligible proceeding as “any Commission proceeding that directly affects one or more of the Participating Public Utilities. . . .” IFA Article 1(c). The establishment of automatic adjustment clauses under SB 408 will directly affect all Participating Public Utilities. NW Natural is a Participating Public Utility under Article 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Article 6.1 of the IFA.

4. NWIGU is pre-certified to receive an Issue Fund Grant under Article 5.2 of the IFA.

5. NWIGU designates the NW Natural Account as the account from which NWIGU intends to request an Issue Fund Grant.

PAGE 2 - NWIGU NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT

6. This Notice of Intent is timely under Article 6.2 of the IFA and is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list for this Docket.

DATED this 6<sup>th</sup> day of December, 2005, Portland, Oregon.



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Edward A. Finklea OSB # 84216  
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Of Attorneys for Northwest Industrial Gas Users  
Users Association

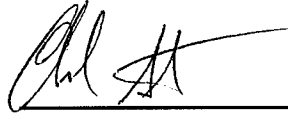
**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing NORTHWEST INDUSTRIAL GAS USERS' NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT on the attached Service List obtained on December 6, 2005 from the Oregon Public Utility Commission's Website, each effected Participating Public Utility, and all pre-certified organizations:

LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 <a href="mailto:lowrey@oregoncub.org">lowrey@oregoncub.org</a>	JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 <a href="mailto:jason@oregoncub.org">jason@oregoncub.org</a>
Michael Early INDUSTRIAL CUSTOMERS OF NW UTILITIES 3333 SW Taylor, Ste. 400 Portland, OR 97204 <a href="mailto:mearly@icnu.org">mearly@icnu.org</a>	Robert Jenks CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
Margaret D. Kirkpatrick Northwest Natural 220 NW 2 <sup>nd</sup> Avenue Portland, OR 97209 <a href="mailto:Margaret.kirkpatrick@nwnatural.com">Margaret.kirkpatrick@nwnatural.com</a>	Paula Pyron Northwest Industrial Gas Users 4113 Wolf Berry Court Lake Oswego, OR 97035-1827 <a href="mailto:ppyron@nwigu.org">ppyron@nwigu.org</a>

[XX] by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown on the attached Service List, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below;

DATED this 6<sup>th</sup> day of December, 2005, Portland, Oregon.



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Of Attorneys for  
Northwest Industrial Gas Users

PAGE - 2 CERTIFICATE OF SERVICE and SERVICE LIST

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