Rates and Regulatory Affairs Facsimile: 503.721.2532



March 30, 2005

Via email and U.S. Mail

Kathryn Logan
Administrative Law Judge
Administrative Hearings Division
Public Utility Commission of Oregon
550 Capitol Street, Northeast, Suite 215
Salem, Oregon 97301-2551
kathryn.logan@state.or.us

Re: **DOCKET UM 1182: In the Matter of an Investigation Regarding Competitive Bidding** 

Motion to Intervene Out of Time and Petition to Intervene of NW Natural

Enclosed please find an original and five copies (sent via U.S. mail) of NW Natural's Motion to Intervene Out of Time and Petition to Intervene in the above-referenced docket.

Please contact me if you have any questions.

Sincerely,

/s/ C. Alex Miller
C. Alex Miller
Director
Regulatory Affairs & Forecasting

enclosures

cc: UM 1182 Service List

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of	)	
an Investigation Regarding	)	
Competitive Bidding	)	UM 1182

## MOTION TO INTERVENE OUT OF TIME OF NORTHWEST NATURAL GAS COMPANY

Northwest Natural Gas Company (NW Natural) hereby moves for permission to intervene in this proceeding out of time. NW Natural's Petition to Intervene is attached to this Motion.

In support of this Motion, NW Natural submits that following the February 18, 2005 intervention deadline, it became aware of the potential application of the competitive bidding process being addressed in this docket to natural gas utilities. *See*, item 1 of Staff's proposed issues list dated March 15, 2005. Given this, NW Natural has an interest in this proceeding and seeks to intervene out of time. NW Natural submits that its participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See*, OAR 860-12-0001. NW Natural is already a party to the companion case UM 1056.

For the foregoing reasons, NW Natural respectfully requests the Commission to exercise its discretion to grant this Motion to Intervene Out of Time.

DATED: this 30th day of March, 2005

Respectfully submitted,

/s/ Susan B. Bergles
Susan B. Bergles
Attorney for NW Natural

#### BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of	)	
an Investigation Regarding	)	
Competitive Bidding	)	UM 1182

# PETITION TO INTERVENE OF NORTHWEST NATURAL GAS COMPANY

Pursuant to Oregon Administrative Rule 860-013-0021, Northwest Natural Gas Company (NW Natural) hereby files this Petition to Intervene as a Party in the above-referenced Public Utility Commission of Oregon (Commission) proceeding. In support of this filing, NW Natural respectfully states as follows:

1. The name and address of the Petitioner is:

NW Natural 220 NW Second Avenue Portland, OR 97209

2. The name and address of Petitioner's authorized representative to receive communications and be placed on the service list for this docket is:

C. Alex Miller
NW Natural
Director, Regulatory Affairs & Forecasting
220 NW Second Avenue
Portland, OR 97209
Phone: (503) 721-2487

Phone: (503) 721-2487 Fax: (503) 721-2532

Email: alex.miller@nwnatural.com

3. The nature and extent of Petitioner's interest in the proceeding is as follows:

NW Natural is a natural gas local distribution company (LDC) that purchases, sells, and

transports natural gas for over 500,000 customers via separate distribution systems in Oregon

and Washington. NW Natural's system in Oregon is subject to the jurisdiction of the

Commission and the Washington system is subject to the Washington Utilities and

Transportation Commission's jurisdiction. <sup>1</sup>

4. The issues Petitioner intends to raise at the proceeding:

After the deadline for timely interventions passed, NW Natural become aware that issues

in this docket may directly pertain to natural gas utilities. See, item 1 of Staff's proposed issues

list dated March 15, 2005. Given the potential application of the competitive bidding process

being addressed in this docket to natural gas utilities, NW Natural has a direct interest in this

proceeding and seeks Party status in order to participate in this docket. If this intervention is

granted, NW Natural intends to respond to the issues list proposed by Staff by April 6, 2005.

NW Natural submits that its participation will not unreasonably broaden the issues, burden the

record, or unreasonably delay the proceeding. See, OAR 860-012-0001.

WHEREFORE, NW Natural respectfully requests that this Petition to Intervene as a

Party be granted.

DATED: this 30th day of March, 2005

Respectfully submitted,

/s/ C. Alex Miller

C. Alex Miller

Director

Regulatory Affairs & Forecasting

1 NW Natural is exempt from FERC jurisdiction under Sections 1(b) and 1(c) of the Natural Gas Act (NGA) for its systems, facilities, and services in Oregon and Washington. Portland Gas and Coke Company, 17 FPC 638 (1957); Natural Gas Pipeline Company of America, et al., 18 FERC ¶ 61,235 (1982).



#### CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2005, I served the foregoing MOTION TO INTERVENE OUT OF TIME and PETITION TO INTERVENE OF NW NATURAL IN OPUC DOCKET UM 1182 upon each party listed below by mailing a copy to the persons at the addresses on the official service list.

/s/ Kelley Miller

Kelley Miller Rates & Regulatory Affairs **NW NATURAL** 220 NW Second Avenue Portland, Oregon 97209-3991 1.503.226.4211, extension 3589

#### **OPUC DOCKET NO. UM 1182**

Official Service List
NW ENERGY COALITION STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE 219 FIRST STREET STE 100 1162 COURT ST NE SEATTLE, WA 98104 SALEM OR 97301-4096

JASON FISDORFER SUSAN K. ACKERMAN CITIZENS' UTILITY BOARD OF OR EGON NIPPC 610 SW BROADWAY STE 308 PO Box 10207 PORTLAND OR 97296-0207 PORTLAND OR 97205

son@oregoncub.org rman@comcast.net Rates & Regulatory Affairs ANN L. FISHER AF LEGAL & CONSULTING SERVICES 1425 SE 20<sup>TH</sup> STE 202 PORTLAND, OR 97201 PORTLAND GENÉRAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204

pge.opuc.filings@pgn.com energlaw@aol.com ANN ENGLISH GRAVATT PHIL CARVER RENEWABLE NORTHWEST PROJECT OREGON DEPARTMENT OF ENERGY

917 SW OAK, STE 303 625 MARION ST NE STE 1 PORTLAND, OR 97205 SALEM OR 97301-3742 philip.h.carver@state. or.us DAVID E HAMILTON ROBERT D KAHN

**NORRIS & STEVENS** 621 SW MORRISON ST STE 800 7900 SE 28TH ST STE 200 PORTLAND OR 97205-3825 MERCER ISLAND WA 98040

rkahn@nippc.org BARTON L KLINE MONICA B MOEN IDAHO POWER COMPANY IDAHO POWER COMPANY PO BOX 70 PO BOX 70 BOISE ID 83707-0070 BOISE ID 83707-0070

mmoen@idahopower.com bkline@idahopower.com
JANET L PREWITT LISA F RACKNER DEPARTMENT OF JUSTICE ATER WYNNE LLP 1162 COURT ST NE 222 SW COLUMBIA ST STE 1800

SALEM OR 97301-4096 PORTLAND OR 97201-6618 Ifr@aterwynne.com JOHN W STEPHENS V DENISE SAUNDERS PORTLAND GENERAL ELECTRIC ESLER STEPHENS & BUCKLEY

121 SW SALMON ST 1WTC1301 888 SW FIFTH AVE STE 700 PORTLAND OR 97204 PORTLAND OR 97204-2021

stephens@eslerstephens.com rs@pgn.com STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE

**SALEM OR 97305** steve@nwenergy.org