## BEFORE THE PUBLIC UTILITY COMMISSION

# **OF OREGON**

# LC 61

In the Matter of

AVISTA CORPORATION dba AVISTA UTILITIES

2014 Integrated Resource Plan

NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300, and the Prehearing Conference Memorandum dated September 23, 2014, Northwest Industrial Gas Users ("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(7). In support of this Petition to Intervene, NWIGU states as follows:

1. The name and address of NWIGU as a party of record in this proceeding is:

Edward A. Finklea
Executive Director
Northwest Industrial Gas Users
326 Fifth Street
Lake Oswego, Oregon 97034
Telephone: (503) 303-4061
Facsimile: (503) 303-4941

E-Mail: efinklea@nwigu.org

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP will represent NWIGU in this proceeding. In addition to Mr. Finklea, all documents related to this proceeding should be served on NWIGU's attorneys at the following address:

Chad M. Stokes Tommy A. Brooks Cable Huston LLP 1001 SW Fifth Ave., Suite 2000 Portland, OR 97204-1136

Telephone: (503) 224-3092 Facsimile: (503) 224-3176

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2. NWIGU is a non-profit association comprised of more than 40 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial and commercial interests, including 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. NWIGU member companies purchase sales and transportation services from Oregon local distribution companies like Avista Corporation dba Avista Utilities ("Avista").

- 3. On August 29, 2014, Avista filed a request for approval of its integrated resource plan. As customers of Avista, NWIGU member companies will be impacted by any outcome in this proceeding. NWIGU therefore has a direct and substantial interest in this proceeding. No other party can adequately represent those interests.
- 4. NWIGU'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.
  - 5. NWIGU waives paper service of documents in this proceeding.
- 6. NWIGU is also filing a Notice of Intent to Request an Issue Fund Grant concurrently with this Petition to Intervene.

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

Dated this 24th day of September 2014.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

Cable Huston

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Of Attorneys for the Northwest Industrial Gas Users

#### CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

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Dated in Portland, Oregon, this 24th day of September 2014.

Chad M. Stokes, OSB No. 004007 Tommy A. Brooks, OSB No. 076071

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4842-8058-3710, v. 1



TOMMY A. BROOKS
ADMITTED IN OREGON AND WASHINGTON

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September 24, 2014

## VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission Attn: Filing Center 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, Oregon 97308-1088

Re:

In the Matter of Avista Corporation dba Avista Utilities –

2014 Integrated Resource Plan

Docket No. LC-61

Dear Filing Center:

Enclosed please find the original and one (1) copy of the **NORTHWEST INDUSTRIAL GAS USER'S PETITION TO INTERVENE** in the above-referenced docket.

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

Very truly yours,

Tommy A. Brooks

TAB:jpd Enclosures

cc: LC-61 Service List