## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## LC 69

In the Matter of

CASCADE NATURAL GAS CORPORATION,

NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE

2018 Integrated Resource Plan

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Northwest Industrial Gas Users

("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceeding and

seeks party status. 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 545 Grandview Drive Ashland, OR 97520 Phone: (541) 708-6338 Facsimile: (541) 708-6339 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:

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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 E-Mail: cstokes@cablehuston.com tbrooks@cablehuston.com

2. NWIGU is a non-profit association comprised of approximately 38 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 including Northwest Natural Gas Company (NW Natural), Avista Utilities (Avista), and Cascade Natural Gas Corporation (Cascade).

3. Cascade filed its Integrated Resource Plan ("IRP") on February 6, 2018, in this docket. Because NWIGU member companies purchase sales and transportation services from Cascade, it has a direct and substantial interest in Cascade's IRP and, therefore, in this proceeding.

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. Specifically, NWIGU has internal and external expertise that will inform the Commission both with respect to the Commission's authority and with respect to the impact of any Commission decision.

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WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the

rights of a party in this proceeding.

Dated this 7<sup>th</sup> day of March 2018.

Respectfully submitted,

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Of Attorneys for Northwest Industrial Gas Users