BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 76

In the Matter of

CASCADE NATURAL GAS CORPORATION,

2020 INTEGRATED RESOURCE PLAN (IRP).

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

Edward A. Finklea
Director of Natural Gas
Alliance of Western Energy Consumers
545 Grandview Drive
Ashland, OR 97520

Phone: (541) 708-6338 Facsimile: (541) 708-6339

E-Mail: efinklea@awec.solutions

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

Chad M. Stokes
Cable Huston, LLP
1455 SW Broadway, Suite 1500
Portland, OR 97201-3412
Telephone (503) 224, 3002

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

E-Mail: cstokes@cablehuston.com

PAGE 1 - ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE

- 2. 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, aerospace, and healthcare providers. 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 Cascade Natural Gas Corporation ("Cascade" or "Company").
- 3. On July 31, 2020, Cascade filed a 2020 Integrated Resource Plan (IRP). Cascade's IRP will discuss, among other things, Cascade's long term planning and growth projections. Projects discussed in the IRP may eventually be used to provide utility service, and included in customers' rates. Because AWEC member companies purchase sales and transportation services from Cascade, AWEC has a direct and substantial interest in Cascade's IRP and, therefore, in this proceeding.
- 4. 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.
- 5. WHEREFORE, AWEC respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 12th day of August 2020.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

Cable Huston LLP

1455 SW Broadway, Suite 1500

Portland, OR 97201-3412 Telephone: (503) 224-3092 Facsimile: (503) 224-3176

E-Mail: <u>cstokes@cablehuston.com</u>

Attorneys for

Alliance of Western Energy Consumers