

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**LC 79**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL,

2022 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 business address of AWEC’s is:

Alliance of Western Energy Consumers  
818 SW 3<sup>rd</sup> Ave., #266  
Portland, OR 97204

2. Chad M. Stokes from the law firm Cable Huston LLP will represent AWEC in this proceeding. All documents related to this proceeding should be served on AWEC’s attorneys and consultants at the following addresses:

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3. AWEC is a non-profit association with a membership consisting of approximately 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, and aerospace. 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 Northwest Natural Gas Company, dba NW Natural (“NW Natural”).

4. This docket is related to NW Natural’s 2022 Integrated Resource Plan. Because AWEC member companies purchase sales and transportation services from NW Natural, AWEC has a direct and substantial interest in NW Natural’s 2022 Integrated Resource Plan and, therefore, in this proceeding.

5. 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.

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

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Dated this 9<sup>th</sup> day of November, 2022.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes".

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Chad M. Stokes, OSB No. 004007  
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Alliance of Western Energy Consumers