

May 9, 2005

Oregon Public Utility Commission
Administrative Hearings Division
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

**Re: NW Natural Petition to Commence Investigation
Docket No. UG 163**

Dear Sir/Madam:

Enclosed for filing, please find an original and five copies of Community Action Directors of Oregon and Oregon Energy Coordinators Association petition to intervene in the above mentioned matter. Copies of this petition have submitted electronically and mailed, postage paid, to the UG 163 service list.

If you have any question, please do not hesitate to call.

Yours truly,

/s/ Thomas James (Jim) Abrahamson

Jim Abrahamson
Oregon Energy Partnership Coordinator

Enclosure
cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 163

In the Matter of)	PETITION TO INTERVENE OF THE
NORTHWEST NATURAL Petition)	COMMUNITY ACTION DIRECTORS
to Commence Investigation)	OF OREGON (CADO) AND OREGON
)	ENERGY COORDINATORS ASSN.
		(OECA)

Pursuant to OAR 860-12-0001 the Community Action Directors of Oregon and Oregon Energy Coordinators Association petition to intervene in this proceeding. In support of its petition, CADO and OECA represent as follows:

1. The business address of CADO is:

Michael Fieldman, President
Community Action Directors of Oregon
2448 W. Harvard Blvd.
Roseburg, Oregon 97470

The business address of OECA is:

Joan Cote, President
Oregon Energy Coordinators Association
2585 State Street NE
Salem, Oregon 97301

2. CADO and OECA will be represented in this proceeding by Jim Abrahamson, Oregon Energy Partnership Coordinator. All documents relating to this proceeding should be served to CADO and OECA at the following address:

Jim Abrahamson
Oregon Energy Partnership / CADO
4035 12th Street Cut-Off, Suite 110
Salem, Oregon 97302

Joan Cote, President
Oregon Energy Coordinators Association
2585 State Street NE
Salem, Oregon 97301

3. CADO and OECA are non-profit associations of low-income service agencies across Oregon. Our agencies provide over 40,000 low-income utility households per year with bill payment assistance, weatherization, energy education and other vital energy-related services. Several of our agencies provide service to the low-income customers of NW Natural who qualify for service through the two low-income public purposes programs: the Oregon Low-Income Energy Efficiency Program (OLIEE) and the Oregon Low-Income Gas Assistance Program (OLGA).

4. CADO and OECA have a substantial interest in this matter and could be affected by the outcome of this proceeding. The low-income public purpose programs cited about were developed in conjunction with the Distribution Margin Normalization (DMN) mechanism. At issue will be modifications or changes to the DMN mechanism

that could adversely impact the support for these vital programs. Additional issues may arise during the course of the proceeding that could also affect our agencies and clients.

5. CADO and OECA believe that our past experience intervening in OPUC utility application, such as UM 1121, UE 102, UM 918, UG 143, our multi-year effort in shaping bill payment assistance programs, and our efforts in developing electric restructuring legislation (SB 1149) provide expertise that will assist the Commissioners during this proceeding. CADO and OECA submit that our participation will not unreasonably broaden the issues, burden the record, or unnecessarily delay the proceeding.

CADO and OECA respectfully requests that this Petition to Intervene as a Party be granted.

Respectfully submitted, this 9th day
Of May, 2005

/s/ Thomas James (Jim) Abrahamson

Jim Abrahamson, Coordinator
Oregon Energy Partnership
4035 12th Street Cut-Off, Suite 110
Salem, Oregon 97302
(503) 316-3951 (phone)
(503) 363-0113 (fax)
jim@cado-oregon.org (e-mail)

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2005 I served a copy of the foregoing Petition to Intervene electronically on all parties and by U.S. Mail, postage-prepaid, to those parties listed on the UG 163 service list.

/s/ Thomas James (Jim) Abrahamson
Thomas James (Jim) Abrahamson
Oregon Energy Project Coordinator
Community Action Directors of Oregon.

PHIL CARVER
OREGON DEPARTMENT OF ENERGY
625 MARION ST NE STE 1
SALEM OR 97301-3742
philip.h.carver@state.or.us

JASON EISDORFER
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205
jason@oregoncub.org

ROBERT JENKS
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205
bob@oregoncub.org

C ALEX MILLER
NORTHWEST NATURAL
220 NW 2ND AVE
PORTLAND OR 97209
alex.miller@nwnatural.com

JANET L PREWITT
DEPARTMENT OF JUSTICE
1162 COURT ST NE
SALEM OR 97301-4096
janet.prewitt@doj.state.or.us

JAMES M VAN NOSTRAND
STOEL RIVES LLP
900 SW FIFTH AVE, STE 2600
PORTLAND OR 97204-1268
jmvannostrand@stoel.com