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December 6, 2005

VIA ELECTRONIC FILING

Oregon Public Utility Commission
550 Capitol St. NE, #215
PO Box 2148
Salem, OR 97308-2148
Attn: Filing Center

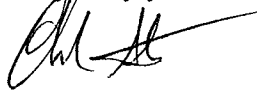
Re: UG 170 – In the Matter of OREGON PUBLIC UTILITY STAFF Directing
NORTHWEST NATURAL GAS COMPANY to File Tariffs Establishing
Automatic Adjustment Clauses

Dear Filing Center:

Please find enclosed for filing in the above-referenced docket the original and one copy of the Northwest Industrial Gas Users' Petition to Intervene.

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

Very truly yours,



Chad M. Stokes

cc: UG-170 Service List (via first class mail)

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 170

In the Matter of OREGON PUBLIC)	
UTILITY COMMISSION STAFF)	
directing)	THE NORTHWEST INDUSTRIAL
)	GAS USERS' PETITION TO
NORTHWEST NATURAL to file tariffs)	INTERVENE
establishing automatic adjustment clauses)	
under the terms of SB 408)	
)	
)	

Pursuant to ORS § 756.525 and OAR § 860-013-0021, the Northwest Industrial Gas Users (“NWIGU”) hereby submit this Petition to Intervene in the above-captioned proceeding and seek party status as provided in OAR § 860-011-0035(5). In support of this Petition, NWIGU states as follows:

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

Paula E. Pyron
Executive Director
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
Telephone: (503) 636-2580
Facsimile: (503) 636-0703
E-Mail: ppyron@nwigu.org

Edward A. Finklea and Chad M. Stokes will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU’s attorneys at the following address:

Edward A. Finklea
Chad M. Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
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2. NWIGU is a non-profit association comprised of thirty-two end-users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial interests, including 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. NWIGU member companies purchase transportation services from Williams Gas Pipeline – West, also known as Northwest Pipeline Corporation and Gas Transmission Northwest Corporation, and purchase sales and transportation services from local distribution companies (“LDCs”), that acquire service from the interstate pipelines. NWIGU member companies acquire natural gas sales and transportation services from Northwest Natural Gas Company (“NW Natural”) in Oregon.

3. Senate Bill 408 was passed by the 2005 Oregon Legislature and signed by the Governor. The new law requires NW Natural, Portland General Electric (“PGE”), Pacific Power and Light (d/b/a “PacifiCorp”) and Avista Utilities (“Avista”) to file tax reports annually with the Commission. Beginning January 1, 2006, these tax reports may trigger an adjustment to customers’ bills if more tax liabilities were included in rates than the actual taxes paid by the utility. Commission Staff has directed NW Natural, Avista, PacifiCorp, and PGE to file tariffs establishing automatic adjustment clauses under the terms of SB 408. The development of the

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automatic adjustment clauses will have an impact on the rates paid by customers. Accordingly, as customers of NW Natural in Oregon, NWIGU member companies have a direct and substantial interest in this proceeding. No other party can adequately represent NWIGU member companies' interest and NWIGU will be affected by any Commission determination made 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.

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

DATED: December 6, 2005.

Respectfully submitted,



Edward A. Finklea, OSB # 84216
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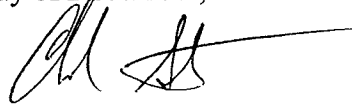
Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

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

LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 lowrey@oregoncub.org	JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org
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Dated in Portland, Oregon, this 6th day of December, 2005.



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