BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 411

In the Matter of	
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE
ADVICE 20-19, SCHEDULE 198 RENEWABLE NATURAL GAS RECOVERY MECHANISM	EXPEDITED CONSIDERATION REQUESTED

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:

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Chad M. Stokes
Cable Huston LLP
1455 SW Broadway, Suite 1500

Portland, OR 97201

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

E-Mail: cstokes@cablehuston.com

- 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, 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").
- 3. This docket is related to NW Natural's request for approval of a renewable natural gas recovery mechanism to enable the company to recover qualified investements outside of a general rate case. Because AWEC member companies purchase sales and transportation services from NW Natural, AWEC has a direct and substantial interest in NW Natural's application 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. AWEC requests expedited consideration of this Petition to facilitate the review of confidential information.

- 6. AWEC contacted the Oregon Citizens' Utility Board, Commission Staff and NW Natural and no party objects to this intervention or the expedited request.
- 7. WHEREFORE, AWEC respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 16th day of September, 2021.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

Cable Huston LLP

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Portland, OR 97201

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E-Mail: cstokes@cablehuston.com

Attorneys for

Alliance of Western Energy Consumers