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CHAD M. STOKES

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December 8, 2006

**VIA ELECTRONIC MAIL  
AND U.S. MAIL**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street, N.E., #215  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of the Public Utility Commission of Oregon, An Investigation to  
Examine Avista Corp., d/b/a Avista Utilities' Gas Purchasing Strategy  
**Docket No. UM-1282**

Dear Filing Center:

Enclosed please find the original and one (1) copy of NORTHWEST INDUSTRIAL  
GAS USERS' PETITION TO INTERVENE in the above-referenced docket. This was filed  
electronically with the OPUC on this date, and will be served both electronically and by U.S.  
Mail on those parties listed on the OPUC's current Service List.

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

Respectfully submitted,



Chad M. Stokes

CMS:wc  
Enclosure(s)

cc: UM-1282 Service List (via email and first class mail)

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1282

In the Matter of	)	
	)	
THE PUBLIC UTILITY COMMISSION	)	THE NORTHWEST INDUSTRIAL
OF OREGON	)	GAS USERS' PETITION TO
	)	INTERVENE
An Investigation pursuant to ORS 757.210	)	
and ORS 757.215 to examine Avista	)	
Corp., d/b/a Avista Utilities' gas	)	
purchasing strategy.	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, 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(7). 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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E-Mail: [efinklea@chbh.com](mailto:efinklea@chbh.com)  
[cstokes@chbh.com](mailto:cstokes@chbh.com)

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 Avista Corp., d/b/a Avista Utilities (“Avista”) in Oregon.

3. At the October 25, 2006, Public Meeting, Staff recommended that the Oregon Public Utility Commission (“Commission”) conduct a review and investigation into Avista's gas purchasing strategy pursuant to ORS 757.210 and ORS 757.215. In particular, Staff urged the Commission to address whether Avista's natural gas prices are higher than appropriate, given the

Company's characteristics and gas purchasing options. As a result, the Commission initiated this proceeding.

4. As customers of Avista, NWIGU member companies are impacted by Avista's gas purchasing strategy. Accordingly, 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.

5. 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 8, 2006

Respectfully submitted,



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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 8, 2006, I caused to be served the foregoing **NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE** upon all parties of record in the current service list of these proceedings by mailing a copy properly addressed with first class postage prepaid and/or via electronic mail.

CRAIG BERTHOLF P.O. BOX 3727 SPOKANE, WA 99220-3727	BRIAN HIRSCHKORN P.O. BOX 3727 SPOKANE, WA 99220-3727
STEPHANIE S. ANDRUS REGULATED UTILITY AND BUSINESS SECTION 1162 COURT STREET NE SALEM, OR 97301-4096	KEN ZIMMERMAN 550 CAPITOL STREET NE SUITE 215 SALEM, OR 97301

DATED: This 8<sup>th</sup> day of December, 2006.



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