December 8, 2006

Oregon Public Utility Commission 550 Capitol Street NE, #215 P.O. Box 2148 Salem, OR 97301-2148

Re: In the Matter of MDU Resources Group, Inc.
Application for Authorization to Acquire Cascade
Natural Gas Corporation
Docket No. UM 1283

Attn: Administrative Law Judge Christina Hayes

Dear Judge Hayes:

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. .

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

Sincerely,

/s/ Thomas James (Jim) Abrahamson

Jim Abrahamson Oregon Energy Partnership Coordinator

Enclosures cc: Service List

## BEFORE THE PUBLIC UTILITY COMMISSION

## **OF OREGON**

## **UM 1283**

	)	
In the Matter of:	) PETITION TO INTERVENE OF THE	3
Application of MDU Resources	) COMMUNITY ACTION DIRECTOR	S
Group, Inc. for Authorization to	) OF OREGON (CADO) AND OREGO	N
Acquire Cascade Natural Gas	) ENERGY COORDINATORS ASSN.	
Corporation	) (OECA)	
	)	

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

1. The business address of CADO is:

Tom Clancey-Burns, President Community Action Directors of Oregon 545 SW 2nd, Suite A Corvallis, Oregon 97333-4466

The business address of OECA is:

Kraig Ludwig, President Oregon Energy Coordinators Association 800 E. Second Street McMinnville, Oregon 97128 2. CADO and OECA will be represented in this proceeding by Jim Abrahamson Coordinator, Oregon Energy Partnership (OEP). All documents relating to this proceeding should be served to CADO and OECA at the following address:

Jim Abrahamson Oregon Energy Partnership / CADO PO Box 7964 945 Columbia Street NE Salem, Oregon 97301 jim@cado-oregon.org

- 3. CADO and OECA are non-profit associations of low-income service agencies across Oregon. These agencies work with over 40,000 low-income utility households a year. Several CADO and OECA member agencies deliver programs and services to low-income customers of Cascade Natural Gas in Oregon that are attempting to make timely payment of their bills and/or are qualified for low-income weatherization assistance.
- 4. CADO and OECA have a substantial interest in the impact of this proposed acquisition on the clients we serve who are also Cascade Natural Gas ratepayers. CADO and OECA seek to intervene to ensure that the proposed acquisition complies with Oregon lay (ORS 757.511) and that applicants both protect, and expand, programs and funding sources aimed at easing low income customers' energy burden.

5. CADO and OECA believe that our past experience in intervening in OPUC utility application such as UM 1209, UM 1121, UE 102, UM 918, UG 143, our efforts in helping to develop and shape low-income bill payment assistance and weatherization programs, and our efforts that impacted the development of electric restructuring legislation (SB 1149) provide expertise that will assist the Commission in their consideration of this proposed acquisition. Further, both CADO and OECA were signatories to the stipulation in UG 167 which provided funding for the recently implemented Cascade Natural Gas low income bill payment assistance and weatherization programs.

Respectfully submitted, this 8<sup>th</sup> day of December, 2006

/s/ Thomas James (Jim) Abrahamson

Jim Abrahamson
Oregon Energy Partnership Coordinator
PO Box 7964
945 Columbia Street N.E.
Salem, Oregon 97301
(503) 316-3951 ext. 612
(503) 363-0113 (fax)
jim@cado-oregon.org (e-mail)

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2006 I served a copy of the foregoing Petition to Intervene, and a signed copy of the General Protective Order, electronically on all parties listed on the UM 1283 service list.

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

Bryan Conway (C) PO Box 2148 Salem, OR 97309-2148 bryan.conway@state.or.us

Edward A. Finklea
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW 5<sup>th</sup> – STE 2000
Portland, OR 97204
efinklea@chbh.com

Chad M Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW 5<sup>th</sup> – STE 2000
Portland, OR 97204
<a href="mailto:cstokes@chbh.com">cstokes@chbh.com</a>

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 Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway – STE 308
Portland, OR 97205
bob@oregoncub.org

Jason W Jones (C)
Assistant Attorney General
Department of Justice, Regulated Utility & Business Section
1162 Court St. NE
Salem, OR 97301-4096
jason.w.jones@state.or.us

Daniel S. Kuntz Assistant General Counsel MDU Resources Group, Inc. PO Box 5650 Bismarck, ND 58506-5650 dan.kuntz@mduresources.com

James M. VanNostrand
Perkins Coie LLP
1120 NW Couch Street, 10<sup>th</sup> Floor
Portland, OR 97209-4128
jvannostrand@perkinscoie.com