BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2145

In the Matter of

NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL

Application to Defer Cost of Service Associated with the Tyson RNG Project.

ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE

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

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- 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, aerospace, and healthcare providers. 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, d/b/a NW Natural.
- 3. On December 31, 2020 NW Natural filed an application to defer costs of service associated with the Tyson Renewable Natural Gas Project in Lexington, Nebraska. Because AWEC member companies purchase sales and transportation services from NW Natural, AWEC has a direct and substantial interest in NW Natural's request 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.

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

Dated this 26th day of February, 2021.

Respectfully submitted,

Chad M. Stokes, OSB No. 004007

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Attorneys for

Alliance of Western Energy Consumers