## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, | ) DOCKET NO. UG-080546<br>)                           |
|---|---|
| Complainant,  | NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE |
| V.  |   |
| NORTHWEST NATURAL GAS COMPANY,                      |   |
| Respondent.   | )<br>)  |

- 1. The Northwest Industrial Gas Users ("NWIGU") hereby submit this Petition to Intervene in the above-captioned proceedings.
- 2. The following name and address for NWIGU should be included on the official list of parties of record in these proceedings, and all correspondence and communications concerning these proceedings should be addressed to:

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

Paula Pyron is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

3. Ed Finklea and Chad Stokes of Cable Huston Benedict Haagensen & Lloyd LLP will represent NWIGU in these proceedings, and have filed a separate Notice of Appearance as

PAGE 1 - NWIGU PETITION TO INTERVENE

required in WAC §480-07-345(2). All correspondence and communications concerning these proceedings should be addressed to:

Edward A. Finklea Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd LLP 1001 SW Fifth Avenue, Suite 2000 Portland, OR 97204-1136 Telephone: (503) 224-3092

Facsimile: (503) 224-3176 E-mail: efinklea@chbh.com cstokes@chbh.com

- 4. This Petition to Intervene is submitted pursuant to WAC § 480-07-355. As required by WAC §480-07-145(2) (d), NWIGU has provided this Petition by electronic mail. In support of this Petition to Intervene, NWIGU states the following:
- NWIGU is a nonprofit association comprised of thirty-five end-users of natural gas with major facilities in the states of Washington, Oregon 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 information service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase natural gas sales and transportation services from local distribution companies ("LDCs"), including Northwest Natural Gas Company ("NW Natural").
  - On March 28, 2008, NW Natural filed with the Washington Utilities and Transportation Commission ("WUTC") a request for a general rate increase for gas service. NW Natural requests a gas rate increase of \$4,342,063 million or 4.75 percent.

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NW Natural's request for authority to charge higher rates for its natural gas services will impact the interests of NWIGU member companies. NWIGU members have a direct and PAGE 2 - NWIGU PETITION TO INTERVENE

substantial interest in NW Natural's request for authority to increase the rates charged to natural gas customers. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.

NWIGU reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in these proceedings.

NWIGU's participation in these proceedings will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, unduly burden the record, or delay these proceedings.

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WHEREFORE, based upon the foregoing, NWIGU respectfully requests leave to intervene as a party in these proceedings, with all of the procedural and substantive rights associated with full party status as described in WAC §480-07-340.

Dated: April 18, 2008.

Respectfully submitted,

Edward A. Finklea, OSB 84216

Chad M. Stokes, WSB 37499, OSB 00400

Cable Huston Benedict Haagensen & Lloyd LLP

1001 SW Fifth Avenue, Suite 2000

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cstokes@cablehuston.com

Of Attorneys for the Northwest Industrial Gas Users

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served the foregoing document this day upon all parties of record (listed below) in these proceedings by mailing a copy properly addressed with first class postage prepaid.

| Kelly Miller                                 | Inara K. Scott                          |
|--|---|
| Rate & Regulatory Affairs                    | Northwest Natural Gas Company           |
| NW Natural                                   | 220 NW Second Avenue                    |
| 220 NW Second Avenue                         | Portland, OR 97209                      |
| Portland, OR 97209                           | Email: <u>inara.scott@nwnatural.com</u> |
| E-mail: kelley.miller@nwnatural.com          |   |
|  |   |
| James Van Nostrand                           | Jennifer Cameron-Rulkowski, AAG         |
| Perkins Coie LLP                             | WUTC                                    |
| Representing NW Natural                      | Attorney General's Office               |
| 1120 NW Couch Street, 10 <sup>th</sup> Floor | State Mail Stop 40128                   |
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|  |   |
| Greg J. Trautman, AAG                        | Simon ffitch, AAG                       |
| WUTC   | Office of the Attorney General          |
| Attorney General's Office                    | Public Counsel                          |
| State Mail Stop 40128                        | 800 Fifth Avenue, Ste. 2000             |
| Olympia, WA 98504                            | Seattle, WA 98104-3188                  |
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|  |   |
| Adam E. Torem, ALJ                           | Paula Pyron                             |
| WUTC   | Executive Director                      |
| 1300 S. Evergreen Park Drive, S.W.           | Northwest Industrial Gas Users          |
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|  | Email: ppyron@nwigu.org                 |
| D 4 1' D 41 1 0 41' 104 1                    | C.A. '1 0000                            |

Dated in Portland, Oregon this 18th day of April, 2008.

Edward A. Finklea, OSB 84216

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PAGE 1 - CERTIFICATE OF SERVICE