

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)	DOCKET NO. UG-170970
)	
HYDRO ONE LIMITED and)	NORTHWEST INDUSTRIAL GAS
AVISTA CORPORATION)	USERS' PETITION TO INTERVENE
)	
For an Order Authorizing Proposed)	
Transaction.)	
)	

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

Edward Finklea
Executive Director
Northwest Industrial Gas Users
545 Grandview Drive
Ashland, OR 97520
Telephone: (541) 708-6338
Facsimile: (541) 708-6339
E-mail: efinklea@nwigu.org

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

3. Chad Stokes and Tommy Brooks of Cable Huston LLP will represent NWIGU in this proceeding and have filed a separate Notice of Appearance as required in WAC §480-07-345(2).

All correspondence and communications concerning this proceeding should be addressed to:

Chad M. Stokes
Tommy A. Brooks
Cable Huston LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: cstokes@cablehuston.com
tbrooks@cablehuston.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:

5. NWIGU is a non-profit association comprised of approximately thirty-eight end users of natural gas with major facilities in the States of Washington, Oregon, and Idaho. NWIGU members include diverse industrial and commercial interests, including 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. NWIGU member companies purchase sales and transportation services from Washington local distribution companies (“LDCs”), including Avista Corporation (“Avista”).

6. On July 19, 2017, Hydro One Limited announced that it had entered into a Merger Agreement with Avista Corporation. On September 14, 2017, Avista filed with the Washington

Utilities and Transportation Commission (“WUTC”) a joint application for an order authorizing the proposed merger transaction.

7. Avista’s request for authority to authorize the merger transaction will impact the interests of NWIGU member companies. NWIGU members have a direct and substantial interest in Avista’s request for authority authorize the merger transaction. No other party can adequately represent NWIGU member companies’ interests, and the Commission’s determination in this proceeding will directly affect NWIGU member companies.

8. 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 this proceeding.

9. NWIGU’s participation in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, unduly burden the record, or delay this proceeding.

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

Dated: October 5, 2017

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 00400
Tommy A. Brooks, WSB 40237, OSB 076071
Cable Huston LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for
Northwest Industrial Gas Users