

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UG-152286
)	
Complainant,)	NORTHWEST INDUSTRIAL GAS
)	USERS' PETITION TO INTERVENE
v.)	
)	
CASCADE NATURAL GAS CORPORATION,)	
)	
Respondent.)	

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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 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 forty end users of natural gas with major facilities in the States of Oregon, Washington, 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 Cascade Natural Gas Corporation (“Cascade”).

6. On December 1 2015, Cascade filed with the Washington Utilities and Transportation Commission (“WUTC”) a request for a general rate increase for gas service to its customers in the state of Washington. Cascade requests an gas rate increase of \$10.5 million or 4.17 percent.

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7. Cascade'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 substantial interest in Cascade'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.
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.

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: December 9, 2015

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 00400
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Of Attorneys for
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

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

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Dated in Portland, Oregon this 9th day of December, 2015

Chad M. Stokes, WSBA 37499, OSB 00400
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