

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET NO.
)	UG-170094
NORTHWEST NATURAL GAS NW)	
NATURAL)	NORTHWEST INDUSTRIAL GAS
)	USERS' PETITION TO INTERVENE
Application for Approval of Corporate)	
Reorganization to Create a Holding)	
Company.)	
)	
)	
)	

1. Northwest Industrial Gas Users (“NWIGU”) hereby submits 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 are filing a separate Notice of Appearance as required in WAC §480-07-345(2).

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

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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
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4. This Petition to Intervene is submitted pursuant to WAC §480-07-355. As required by WAC §480-07-140(5), NWIGU has provided this Petition electronically through the commission's records web portal. In support of this Petition to Intervene, NWIGU states the following:
 5. NWIGU is a non-profit association comprising 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, including Northwest Natural Corporation ("NW Natural").
 6. On February 10, 2017, NW Natural filed its Application for Approval of Corporate Reorganization to Create a Holding Company with the Washington Utilities and Transportation Commission ("WUTC").
 7. NW Natural's request for authority for corporate reorganization and to create a holding company will impact the interests of NWIGU member companies. NWIGU members have a

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direct and substantial interest in NW Natural’s ability to combine regulated activities with non-regulated activities within the same or affiliated companies. 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 identifying and implementing protections for all customers that are likely necessary as a result of NW Natural combining regulated with non-regulated activities. NWIGU is actively participating in the NW Natural docket in Oregon addressing the same request and can assist the Commission and other parties based on those experiences. NWIGU’s participation 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: July 3, 2017

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 004007
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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 in the commission's master service list (listed below) in this proceeding by electronic mail.

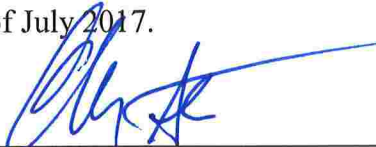
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Dated in Portland, Oregon this 3rd day of July 2017.



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