

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NO. UG 200994
	)	
Complainant,	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS' PETITION TO
v.	)	INTERVENE
	)	
NORTHWEST NATURAL GAS	)	
COMPANY, dba NW NATURAL	)	
	)	
Respondent.	)	
_____	)	

1. Alliance of Western Energy Consumers (“AWEC”) hereby submit this Petition to Intervene in the above-captioned proceeding.
  
2. The following name and address for AWEC 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 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

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

3. Chad Stokes and Tommy Brooks of Cable Huston LLP will represent AWEC 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  
1455 SW Broadway, Suite 1500  
Portland, OR 97201  
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(5), AWEC has provided this Petition by electronic mail. In support of this Petition to Intervene, AWEC states the following:

5. AWEC is a non-profit association comprised of more than 40 end users of natural gas with major facilities in the States of Washington, Oregon, and Idaho. AWEC members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, and aerospace. 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 Washington local distribution companies (“LDCs”), including Northwest Natural Gas Company (“NW Natural”).

6. On December 18, 2020, NW Natural filed for authority to increase rates and charges for natural gas service with the Washington Utilities and Transportation Commission (“WUTC”).

The filing seeks a multi-year rate plan. In year one, NW Natural seeks to increase rates by \$6.3

PAGE 2 – AWEC’S PETITION TO INTERVENE

million effective November 1, 2021. In year two, NW Natural seeks to increase rates by an additional \$3.2 million effective November 1, 2022.

7. NW Natural’s request for authority to increase rates will impact the interests of AWEC member companies. AWEC members have a direct and substantial interest in NW Natural’s request for authority increase rates. No other party can adequately represent AWEC member companies’ interests, and the Commission’s determination in this proceeding will directly affect AWEC member companies.

8. AWEC 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. AWEC’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, AWEC 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 21, 2020.

Respectfully submitted,



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Chad M. Stokes, WSB 37499, OSB 00400  
Tommy A. Brooks, WSB 40237, OSB 076071  
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Alliance of Western Energy Consumers