

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Cascade Natural Gas Corporation, Tariff Revision, Advice No. CNG/W22-03-02) DOCKET NO. UG-220198
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) ALLIANCE OF WESTERN ENERGY
) CONSUMERS' PETITION TO
) INTERVENE
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1. Alliance of Western Energy Consumers (“AWEC”) hereby submit this Petition to Intervene in the above-captioned proceeding.
2. Chad Stokes 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
Cable Huston LLP
1455 SW Broadway, Suite 1500
Portland, OR 97201
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-mail: cstokes@cablehuston.com

3. 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:

4. AWEC is a non-profit association comprised of approximately 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 Cascade Natural Gas Corporation (“Cascade”).

5. On March 24, 2022, Cascade filed for authority to make certain revisions to its tariffs to revise the method used to amortize the historical level of protected EDIT adopted in UG-170929, claiming that there is a potential normalization violation. Cascade’s filing relies on the Private Letter Ruling Puget Sound Energy received from the Internal Revenue Service.
6. Cascade’s request for authority to revise its tariffs to address the potential normalization violation will impact the interests of AWEC member companies. AWEC members have a direct and substantial interest in Cascade’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.
7. 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.
8. 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.

9. 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: April 15, 2022.

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 00400
Cable Huston LLP
1455 SW Broadway, Suite 1500
Portland, OR 97201
Telephone: (503) 224-3092
E-mail: cstokes@cablehuston.com

Attorneys for
Alliance of Western Energy Consumers