

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|                            |   |                              |
|----------------------------|---|------------------------------|
| WASHINGTON UTILITIES AND   | ) | DOCKET NO. UG-111233         |
| TRANSPORTATION COMMISSION, | ) |                              |
|                            | ) | NORTHWEST INDUSTRIAL GAS     |
| Complainant,               | ) | USERS' PETITION TO INTERVENE |
|                            | ) |                              |
| v.                         | ) |                              |
|                            | ) |                              |
| NORTHWEST NATURAL GAS      | ) |                              |
| COMPANY                    | ) |                              |
|                            | ) |                              |
| 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:

Paula E. Pyron  
Executive Director  
Northwest Industrial Gas Users  
4113 Wolf Berry Court  
Lake Oswego, OR 97035-1827  
Telephone: (503) 636-2580  
Facsimile: (503) 636-0703  
E-mail: ppyron@nwigu.org

Paula Pyron 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).

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In addition to Ms. Pyron, all correspondence and communications concerning this proceeding should be addressed to:

Chad M. Stokes  
Tommy A. Brooks  
Cable Huston  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
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[tbrooks@cablehuston.com](mailto: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 nonprofit association comprised of thirty-eight end-users of natural gas with major facilities in the states of Washington, Oregon and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics and aerospace. The association provides an information service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase natural gas sales and transportation services from local distribution companies, including NW Natural.
6. On July 7, 2011, NW Natural filed with the Washington Utilities and Transportation Commission (“Commission”) a revision to its Tariff WN U-6. Specifically, NW Natural proposed to revise Schedule P “Determination of Company’s Purchased Gas Cost Adjustments and Weighted Costs of Gas,” with a stated effective date of August 6, 2011. The proposed revision would change the definition of gas commodity costs to include the costs of gas reserves

acquired through a joint venture with Encana Oil and Gas (USA), Inc. (“Encana”). As part of the filing, NW Natural requests a prudency determination for the joint venture with Encana.

7. NW Natural’s proposed revision to Schedule P will impact the interests of NWIGU member companies. NWIGU members have a direct and substantial interest in NW Natural’s request. NWIGU participated in this same matter on behalf of its member before the Oregon Public Utilities Commission and successfully contributed to that commission’s understanding and ultimate decision in this matter.

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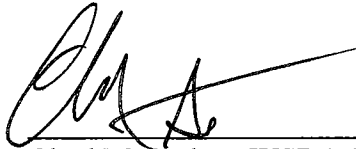
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10. WHEREFORE, based upon the foregoing, NWIGU respectfully requests leave to intervene as a party in this proceeding, with all of the procedural and substantive rights associated with full party status as described in WAC §480-07-340.

Dated: August 10, 2011.

Respectfully submitted,



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Chad M. Stokes, WSBA 37499, OSB 00400  
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Of Attorneys for the  
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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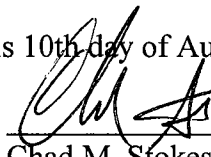
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Dated in Portland, Oregon this 10<sup>th</sup> day of August, 2011.



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