

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UG 210755
)	
Complainant,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS' PETITION TO
v.)	INTERVENE
)	
CASCADE NATURAL GAS CORPORATION)	
)	
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
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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 Cascade Natural Gas Corporation (“Cascade”).

6. On September 30, 2021, Cascade filed for authority to increase rates and charges for natural gas service with the Washington Utilities and Transportation Commission (“WUTC”).

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7. Cascade’s request for authority to increase rates 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.

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: October 5, 2021.

Respectfully submitted,



Chad M. Stokes, WSB 37499, OSB 00400
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