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February 24, 2011

**VIA ELECTRONIC FILING
& FIRST CLASS MAIL**

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

**Re: *In the Matter of Northwest Natural Gas Company, dba NW Natural
2011 Integrated Resource Plan;
Docket No. LC 51***

Dear Filing Center:

Enclosed for filing in the above-referenced matter please find an original and one (1) copy of the **Northwest Industrial Gas Users' Petition to Intervene and Waiver of Paper Service**. Please note that this document was submitted via electronic mail to the PUC Filing Center on this date, with copies served on the current Service List via e-mail and/or first class mail.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,

/s/ Chad M. Stokes
Chad M. Stokes

CMS:ki
Enclosures

cc: LC 51 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 51

In the Matter of the Application of NORTHWEST NATURAL GAS COMPANY, dba NW Natural, 2011 Integrated Resources Plan)) THE NORTHWEST INDUSTRIAL) GAS USERS' PETITION TO) INTERVENE AND WAIVER OF) PAPER SERVICE))
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Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Northwest Industrial Gas Users (“NWIGU”) hereby submit this Petition to Intervene in the above-captioned proceeding and seek party status as provided in OAR § 860-011-0035(7). In support of this Petition, NWIGU states as follows:

1. The name and address of NWIGU as a party of record in this proceeding is:

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

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston Benedict Haagensen and Lloyd will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU’s attorneys at the following address:

Chad M. Stokes
Tommy A. Brooks
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

2. NWIGU is a non-profit association comprised of thirty-eight end users of natural gas with major facilities in the States of Oregon, Washington, 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 informational service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase sales and transportation services from Oregon local distribution companies (“LDCs”), including Northwest Natural Gas Company (“NW Natural”), that acquire service from interstate pipelines.

3. On January 12, 2011, NW Natural filed its Integrated Resources Plan (Plan). The Plan defines the mix of natural gas supply and conservation designated to meet expected future demand requirements at the lowest reasonable cost to the utility and its ratepayers. As customers of NW Natural, NWIGU member companies will be impacted by any outcome in this proceeding. NWIGU therefore has a direct and substantial interest in this proceeding. No other party can adequately represent NWIGU member companies’ interest and NWIGU will be affected by any Commission determination made in this proceeding.

4. NWIGU’s participation in this proceeding will assist the Commission resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

5. NWIGU waives paper service of documents in this proceeding.

WHEREFORE, NWIGU respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 24th day of February, 2011.

Respectfully submitted,

/s/ Chad M. Stokes

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

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Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

W=Waive Paper Service C=Confidential HC=Highly Confidential

<p>CITIZENS' UTILITY BOARD OF OREGON (W) Gordon Feighner, Energy Analyst 610 SW Broadway, Ste 400 Portland, OR 97205 gordon@oregoncub.org</p>	<p>CITIZENS' UTILITY BOARD OF OREGON (W) Robert Jenks, Executive Director 610 SW Broadway, Ste 400 Portland, OR 97205 bob@oregoncub.org</p>
<p>CITIZENS' UTILITY BOARD OF OREGON (W) G. Catriona McCracken Legal Counsel/Staff Attorney 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org</p>	<p>NW NATURAL (W) Jennifer Gross Tariff & Regulatory Affairs Consultant 220 NW 2nd Avenue Portland, OR 97209 mrt@nwnatural.com</p>
<p>NORTHWEST PIPELINE GP (W) Jane Harrison Mgr-Marketing Services 295 Chipeta Way Salt Lake City UT 84108 jane.f.harrison@williams.com</p>	<p>NORTHWEST PIPELINE GP (W) Stewart Merrick Attorney At Law 295 Chipeta Way Salt Lake City, UT 84108 stewart.merrick@williams.com</p>
<p>PUBLIC UTILITY COMMISSION OF OREGON (W) Moshrek Sobhy PO Box 2148 Salem, OR 97308-2148 moshrek.sobhy@state.or.us</p>	

Dated in Portland, Oregon, this 24th day of February, 2011.

/s/ Chad M. Stokes

Chad M. Stokes, OSB No. 004007

Tommy A. Brooks, OSB No. 076071

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