

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 435

In the Matter of)	
)	
NORTHWEST NATURAL GAS)	PETITION TO INTERVENE OF SMALL
COMPANY, DBA NW Natural,)	BUSINESS UTILITY ADVOCATES
)	
Request for General Rate Revision)	
General Rate Revision)	

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Small Business Utility Advocates, (“SBUA”), petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

1. The contact information for Petitioner to be included on the service list is:

James Birkelund
SBUA
548 Market Street, Suite 11200
San Francisco, CA 94104
james@utilityadvocates.org

2. SBUA will be represented in this matter by the following:

Diane Henkels, Attorney
SBUA
621 SW Morrison St. Ste 1025
Portland, OR 97205
Tel: 541.270.6001
diane@utilityadvocates.org

3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has over 200 members, of which many are Oregon-based entities, and many of the Oregon SBUA members are customers of Northwest Natural Gas. SBUA represents small business community regarding proceedings before utility commissions and other public bodies, educates and provides advice to small businesses with respect to utility rates and service. SBUA's interest in this docket is ensuring that small businesses are ensured fair and reasonable rates.

4. SBUA has special knowledge and expertise to contribute to this docket. SBUA has represented small commercial customers in the UM 2114 docket regarding the impact of the COVID-19 on Utilities and utility customers, and NW Natural is one of the utility stakeholders in that docket. SBUA has also represented small commercial customers in other utility rate cases before this Commission. SBUA and its legal counsel have substantial expertise working with and representing small business generally, and significant experience in utility regulatory matters, including representing and advising small business in ratemaking and other utility regulatory matters. SBUA recently represented small commercial customers in another utility's rate case, UE 374 PacifiCorp dba Pacific Power Request for General Rate Revision.

5. SBUA has a direct and substantial interest in this proceeding that is not represented by any other party, and will be affected by any Commission determination made in connection with this proceeding. No other party represents exclusively these ratepayers and commercial customers are a significant portion of the NW Natural customers and ratepayers.

6. It is in the public interest to allow SBUA to intervene in this proceeding. SBUA's intervention will assist the Commission in resolving the issues in this proceeding, SBUA's

intervention will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. SBUA requests the addresses above be added to the service list.

RESPECTFULLY SUBMITTED January 19, 2022.



s/ Diane Henkels

Diane Henkels
Attorney, Small Business Utility Advocates
www.utilityadvocates.org
621 SW Morrison St. Ste 1025
Portland, OR 97205
541-270-6001
diane@utilityadvocates.org