CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

ATTORNEYS AT LAW
SUITE 2000
1001 SW FIFTH AVENUE
PORTLAND, OREGON 97204-1136

TELEPHONE (503) 224-3092 FACSIMILE (503) 224-3176

CHAD M. STOKES

<u>cstokes@chbh.com</u> www.cablehuston.com

December 5, 2006

VIA ELECTRONIC FILING & FIRST CLASS MAIL

Oregon Public Utility Commission 550 Capitol St. NE, #215 PO Box 2148 Salem, OR 97308-2148 Attn: Filing Center

Re: UM 1283 – In the Matter of MDU Resources Group, Inc., Application for

Authorization to Acquire Cascade Natural Gas Corporation

Dear Filing Center:

Please find enclosed the original and one copy of the NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE in the above-referenced docket.

Thank you for your assistance. Should you have any questions regarding this matter, please feel free to contact me.

Very truly yours,

Chad M. Stokes

CMS/tr

cc: UM-1283 Service List (via email & first class mail)

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1283

)
In the Matter of)
) THE NORTHWEST INDUSTRIAL
MDU RESOURCES GROUP, INC.,) GAS USERS' PETITION TO
) INTERVENE
)
Application for Authorization to Acquire	
Cascade Natural Gas Corporation)
)

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

Edward A. Finklea and Chad M. Stokes will represent NWIGU in this proceeding. All documents related to this proceeding should be served on NWIGU's attorneys at the following address:

Edward A. Finklea Chad M. Stokes Cable Huston Benedict Haagensen & Lloyd LLP 1001 SW Fifth Ave., Suite 2000 Portland, OR 97204-1136 Telephone: (503) 224-3092

Facsimile: (503) 224-3176 E-Mail: <u>efinklea@chbh.com</u> cstokes@chbh.com

- 2. NWIGU is a non-profit association comprised of thirty-two 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 transportation services from Williams Gas Pipeline West, also known as Northwest Pipeline Corporation and Gas Transmission Northwest Corporation, and purchase sales and transportation services from local distribution companies ("LDCs") that acquire service from the interstate pipelines. NWIGU member companies acquire natural gas sales and transportation services from Cascade Natural Gas Corporation ("Cascade") in Oregon.
- 3. In July 2006, MDU Resources Group, Inc. and Cascade executed a merger agreement.

 On November 7, 2006, MDU Resources Group, Inc. filed an application with the Oregon Public Utility Commission ("Commission") to acquire Cascade. Under ORS 757.511 and Commission precedent, MDU Resources Group Inc. and Cascade must demonstrate Net Benefits will flow to

customers from the merger. The outcome of this proceeding may impact Cascade's rates and terms and conditions of service. Accordingly, as customers of Cascade in Oregon, NWIGU member companies have a direct and substantial interest 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 in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

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

Dated: December 5, 2006

Respectfully submitted,

Edward A. Finklea, OSB # 84216

Chad M. Stokes, OSB # 00400

Cable Huston Benedict Haagensen & Lloyd LLP

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Portland, OR 97204-1136

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Facsimile: (503) 224-3176

E-Mail: efinklea@chbh.com

cstokes@chbh.com

Of Attorneys for the

Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 5, 2006, I caused to be served the foregoing **NORTHWEST INDUSTRIAL GAS USERS' PETITION TO INTERVENE** upon all parties of record in the current service list of these proceedings by mailing a copy properly addressed with first class postage prepaid and/or via electronic mail.

BRYAN CONWAY PO BOX 2148 SALEM, OR 97309-2148	LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND, OR 97205
JASON EISDORFER ENERGY PROGRAM DIRECTOR 610 SW BROADWAY STE 308 PORTLAND, OR 97205	ROBERT JENKS 610 SW BROADWAY STE 308 PORTLAND, OR 97205
JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS 1162 COURT ST NE SALEM, OR 97301-4096	DANIEL S. KUNTZ MDU RESOURCES GROUP, INC. PO BOX 5650 BISMARCK, ND 58506-5650
JAMES M VAN NOSTRAND PERKINS COIE LLP 1120 NW COUCH STREET, 10TH FLR PORTLAND, OR 97209-4128	

DATED: This 5th day of December, 2006.

Edward A. Finklea

OSB # 84216

Chad M. Stokes

OSB #00400

Cable Huston Benedict Haagensen & Lloyd LLP

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Portland, OR 97204-1136

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cstokes@chbh.com

Of Attorneys for Northwest Industrial Gas Users