

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 51**

|                                |   |                                |
|--------------------------------|---|--------------------------------|
| In the Matter of               | ) |                                |
|                                | ) | NOTICE OF INTERVENTION         |
| NW NATURAL GAS COMPANY,        | ) | (ORS 774.180) OF THE CITIZENS' |
| dba NW NATURAL                 | ) | UTILITY BOARD OF OREGON        |
|                                | ) |                                |
| 2011 Integrated Resource Plan. | ) |                                |
| _____                          | ) |                                |

Pursuant to ORS 774.180 and OAR 860-001-0300 The Citizens' Utility Board of Oregon (CUB) hereby files this Notice of Intervention and Waiver of Paper Service in this proceeding. Pursuant to ORS 774.180, CUB may intervene in Commission proceedings as of right. In support of this notice of intervention, CUB provides the following information:

- a. The name and address of Intervenor Citizens' Utility Board of Oregon (CUB) is:

Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984

- b. The name and address of the attorney representing CUB is:

G. Catriona McCracken  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)

- c. CUB requests that service of documents also be made on:

Bob Jenks  
Executive Director  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Bob@OregonCUB.org](mailto:Bob@OregonCUB.org)

Gordon Feighner  
Utility Analyst  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Gordon@OregonCUB.org](mailto:Gordon@OregonCUB.org)

- d. Legislation creating the Citizens' Utility Board of Oregon (CUB) was enacted into law in 1985. CUB was created to ensure that utility consumers have an effective advocate to reflect their needs and interests when it comes to public policies affecting the quality and price of utility services. ORS 774.020. CUB's membership averages 4,500 persons per year.
- e. CUB intends to monitor the proceeding and, if necessary, raise issues that are appropriate to the proceeding. No other party could adequately represent the interest of utility consumers.
- f. CUB has participated in Commission proceedings since its inception in 1985.

Dated this 2<sup>nd</sup> day of February, 2011.

Respectfully submitted,



John C. Sturm, OSB #105174  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[john@oregoncub.org](mailto:john@oregoncub.org)

## LC 51 – CERTIFICATE OF SERVICE

I hereby certify that, on this 2<sup>nd</sup> day of February, 2011, I served the foregoing **NOTICE OF INTERVENTION (ORS 774.180) OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket LC 51 upon each party listed in the LC 51 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

**(W denotes waiver of paper service)**

**(C denotes service of Confidential material authorized)**

**W** NW NATURAL  
JENNIFER GROSS  
TARIFF & REGULATORY AFFAIRS  
220 NW 2ND AVENUE  
PORTLAND OR 97209  
[jennifer.gross@nwnatural.com](mailto:jennifer.gross@nwnatural.com)

**W** PUBLIC UTILITY COMMISSION  
MOSHREK SOBHY  
PO BOX 2148  
SALEM OR 97308  
[moshrek.sobhy@state.or.us](mailto:moshrek.sobhy@state.or.us)

Respectfully submitted,



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