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September 2, 2016

## VIA HAND DELIVERY

Ms. Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83702

Re: *Case No. INT-G-16-02*

Dear Jean:

Please find enclosed for filing with the Commission originals of the following pleadings (along with 7 copies for the Commission and 1 of each to be conformed):

1. Motion for Limited Admission Pro Hac Vice; and
2. Petition to Intervene of Northwest Industrial Gas Users.

A copy of the Motion for Limited Admission Pro Hac Vice, along with required fees and copies of Certificates of Good Standing have been hand delivered to the Idaho State Bar. Should you have any questions please give me a call. Thank you.

Sincerely,



Michael C. Creamer

MCC:lah

Enclosures

cc: Chad Stokes

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*Attorneys for Northwest Industrial Gas Users*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF  
INTERMOUNTAIN GAS COMPANY  
FOR THE AUTHORITY TO  
CHANGE ITS RATES AND  
CHARGES FOR NATURAL GAS  
SERVICE TO NATURAL GAS  
CUSTOMERS IN THE STATE OF  
IDAHO**

**CASE NO. INT-G-16-02  
PETITION TO INTERVENE OF  
NORTHWEST INDUSTRIAL GAS  
USERS**

Pursuant to Rules of Procedure 71-75 of the Idaho Public Utilities Commission ("Commission") Rules of Procedure, IDAPA 31.01.01.071-.075, Northwest Industrial Gas Users ("NWIGU") hereby submits this Petition to Intervene in the above-captioned proceeding. As discussed below, NWIGU has a direct and substantial interest in these proceedings, and respectfully requests that the Commission grant its intervention.

The name and address of NWIGU as an intervenor in this proceeding is:

Northwest Industrial Gas Users  
c/o Edward A. Finklea  
Executive Director  
545 Grandview Drive  
Ashland, OR 97520  
Phone: (541) 708-6338  
Facsimile: (541) 708-6339  
E-Mail: [efinklea@nwigu.org](mailto:efinklea@nwigu.org)

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP, and Michael C. Creamer from the law firm of Givens Pursley LLP will represent NWIGU in this proceeding. In addition to Mr. Finklea, all notices, pleadings, production requests and responses, and other documents related to this proceeding should be served on NWIGU's attorneys at the following address:

Chad M. Stokes  
Tommy A. Brooks  
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1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
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1. NWIGU is a non-profit association comprised of approximately 40 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial and commercial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics,

aerospace, and healthcare providers. 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 local distribution companies including Intermountain Gas Company (“Intermountain” or “the Company”).

2. On August 12, 2016, Intermountain filed an Application for authority to change its rates and charges for natural gas service to customers in the state of Idaho effective September 12, 2016. Specifically, the Company intends to raise natural gas rates by 4.06 percent, or \$10.2 million. This is Intermountain’s first rate case in 30 years.

3. Because NWIGU member companies purchase sales and transportation services from Intermountain, NWIGU and its members have a direct and substantial interest in Intermountain’s Application in this proceeding, and intends to participate in all respects herein as a party as its interest may arise.

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

WHEREFORE, for the reasons described above, NWIGU respectfully requests leave to intervene and fully participate with all rights as a formal party in this proceeding.

This Petition is accompanied by a Motion for Limited Admission Pro Hac Vice requesting admission of Chad M. Stokes and Tommy A. Brooks to serve as counsel to NWIGU in this proceeding.

Dated this 2<sup>nd</sup> day of September 2016.

Respectfully submitted,



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Chad M. Stokes  
CABLE HUSTON LLP  
*Attorneys for Northwest Industrial Gas Users*



Michael C. Creamer  
GIVENS PURSLEY LLP  
*Local Counsel*

CERTIFICATE OF SERVICE

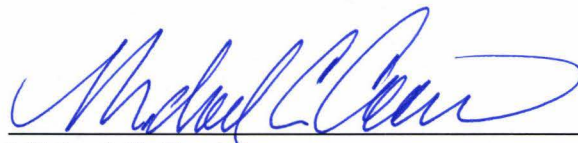
I HEREBY CERTIFY that on the 2<sup>nd</sup> day of September, 2016 I caused an original and seven (7) copies of the foregoing to be served upon:

Ms. Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83702

by hand delivering the same to the above-named at the last known address(s) as set forth above and mailing a copy to the addresses below.

Ronald L. Williams  
Williams Bradbury, P.C.  
1015 W. Hays Street  
Boise, ID 83702

Michael P. McGrath  
Director, Regulatory Affairs  
Intermountain Gas Company  
P O Box 7608  
Boise, ID 83707



Michael C. Creamer