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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Alliance of Western Energy Consumers

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 IN THE STATE OF IDAHO**

CASE NO. INT-G-22-07

**PETITION TO INTERVENE OF
ALLIANCE OF WESTERN ENERGY
CONSUMERS**

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

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

Alliance of Western Energy Consumers
3519 NE 15th Avenue #249
Portland, OR 97212

Chad M. Stokes from the law firm Cable Huston LLP will represent AWEC in this proceeding. All notices, pleadings, production requests and responses, and other documents related to this proceeding should be served on AWEC's attorneys at the following address:

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Chad M. Stokes
Cable Huston LLP
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AWEC respectfully requests that any communications to AWEC also include a courtesy copy to Brad Mullins; brmullins@mwanalytics.com.

AWEC is a non-profit association consisting of approximately 40 end users of natural gas with major facilities in the States of Idaho, Oregon, and Washington. AWEC members include diverse industrial and commercial 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. AWEC member companies purchase sales and transportation services from local distribution companies including Intermountain Gas Company (“Intermountain” or “the Company”).

On December 1, 2022, Intermountain filed a request to increase the rates and charges for natural gas distribution service in the state of Idaho effective on or after January 1, 2023. Intermountain proposes to increase the revenue collected through natural gas rates by approximately \$11.3 million, which equates to a margin revenue increase of approximately 10.3%.

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

AWEC'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, AWEC 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 to serve as counsel to AWEC in this proceeding.

Dated this 9th day of December 2022.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes", is written over a horizontal line.

Chad M. Stokes
CABLE HUSTON LLP

*Attorneys for Alliance of Western Energy
Consumers*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of December 2022 I caused an original and seven (7) copies of the foregoing to be served upon:

Jan Noriyuki
Idaho Public Utilities Commission
11331 W. Chinden Blvd
Building 8, Suite 201-A
Boise, ID 83714

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

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