

H  
**CABLE HUSTON**<sub>LLP</sub>

RECEIVED

2018 APR 25 PM 4:18

IDAHO PUBLIC  
UTILITIES COMMISSION

[jcavanagh@cablehuston.com](mailto:jcavanagh@cablehuston.com)

[www.cablehuston.com](http://www.cablehuston.com)

JONATHAN J. CAVANAGH  
ADMITTED IN IDAHO, OREGON, AND WASHINGTON

April 25, 2018

**VIA FEDERAL EXPRESS**

Diane M. Hanian, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83702

Re: Case No. *GNR-U-18-01*

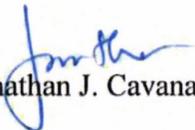
Dear Ms. Hanian:

Please find enclosed for filing with the Commission the original of the following pleading (along with 7 copies):

1. Late-Filed Petition to Intervene of Alliance of Western Energy Consumers

Copies of the Petition are being transmitted to the service list via electronic mail. Should you have any questions, please give me a call. Thank you.

Sincerely,

  
Jonathan J. Cavanagh

JJC:lms  
Enclosure(s)

Jonathan J. Cavanagh, ISB No. 8609  
Cable Huston LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
jcavanagh@cablehuston.com

ORIGINAL

*Attorneys for Alliance of Western Energy Consumers*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE  
INVESTIGATION INTO THE  
IMPACT OF FEDERAL TAX CODE  
REVISIONS ON UTILITY COSTS  
AND RATEMAKING**

**CASE NO. GNR-U-18-01**

**LATE-FILED PETITION TO  
INTERVENE OF ALLIANCE OF  
WESTERN ENERGY CONSUMERS**

Pursuant to Rules 71 through 75 of the Idaho Public Utilities Commission (“Commission”) Rules of Procedure, IDAPA 31.01.01.071 – .075 (“Rules”), Alliance of Western Energy Consumers (“AWEC”) hereby submits this Petition to Intervene (“Petition”) in the above-captioned proceeding. This Petition is being filed after the March 6<sup>th</sup> deadline for filing petitions to intervene set forth in Commission Order No. 33991. Pursuant to Rule 73, AWEC sets forth below the substantial reason for the delay in this filing. AWEC has a direct and substantial interest in these proceedings, and respectfully requests that the Commission grant its intervention.

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

Edward A. Finklea  
Director of Natural Gas  
Alliance of Western Energy Consumers  
545 Grandview Drive  
Ashland, OR 97520  
Phone: (541) 708-6338  
Facsimile: (541) 708-6339  
E-Mail: efinklea@awec.solutions

Jonathan J. Cavanagh from the law firm Cable Huston LLP will represent AWEC 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 AWEC's attorneys at the following address:

Jonathan J. Cavanagh  
Cable Huston LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [jcavanagh@cablehuston.com](mailto:jcavanagh@cablehuston.com)

1. AWEC is a non-profit association whose members are large energy consumers 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, aerospace, and healthcare providers. AWEC provides an informational service to its members and participates in various regulatory matters that affect member interests. On March 31, 2018, Northwest Industrial Gas Users ("NWIGU") merged into the Industrial Customers of Northwest Utilities ("ICNU") and ICNU changed its name to AWEC effective April 1, 2018. The advocacy and work previously performed by NWIGU now occurs as part of AWEC. AWEC member companies purchase sales and transportation services from local distribution companies, including Intermountain Gas Company ("Intermountain").

2. On January 17, 2018, the Commission opened this case to investigate whether it should adjust utilities' rates and charges to reflect changes in the corporate income tax rate and revenue requirement reductions caused by the 2017 federal Tax Cuts and Jobs Act, which became effective January 1, 2018.

3. Because AWEC member companies purchase sales and transportation services from Intermountain, AWEC and its members will be impacted by any decision in this proceeding and therefore have a direct and substantial interest in this investigation. AWEC requests permission to participate in this proceeding as a party as its interest may arise.

4. 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.

5. AWEC's attorney became aware of this filing after the deadline to intervene had passed. AWEC typically receives notice of the initiation of natural gas proceedings by monitoring new dockets related to Intermountain. AWEC did not see the initial filing for this docket because this case has been handled as a multi-utility generic proceeding instead of a case with an Intermountain gas specific case number. AWEC therefore asserts there is good cause to grant its late-filed Petition. AWEC's intervention and participation will not prejudice any of the current parties in the proceeding.

6. Because this Petition to intervene is late, AWEC understands that it will be bound by orders and notices earlier entered as a condition of granting the untimely petition.

7. AWEC contacted Intermountain about this late-filed intervention, and Intermountain does not object.

///

///

///

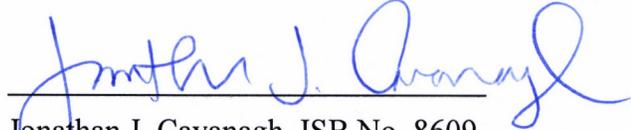
///

///

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.

Dated this 15<sup>th</sup> day of April 2018.

Respectfully submitted,



Jonathan J. Cavanagh, ISB No. 8609  
Cable Huston LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
jcavanagh@cablehuston.com

*Attorneys for Alliance of Western Energy  
Consumers*

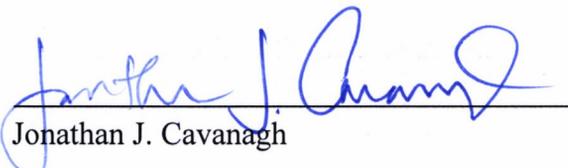
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 25<sup>th</sup> day of April 2018 I caused an original and seven (7) copies of the foregoing to be served upon:

Diane M. Hanian, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83702

by mailing via Federal Express the same to the above-named at the last known address(s) as set forth above and sending a copy via electronic mail to the email addresses below.

Michael P. McGrath Director, Regulatory Affairs Intermountain Gas Company PO Box 7608 Boise, ID 83707 <a href="mailto:mike.mcgrath@intgas.com">mike.mcgrath@intgas.com</a>	Preston N. Carter Givens Pursley LLP 601 W. Bannock St. Boise, ID 83702 <a href="mailto:prestoncarter@givenspursley.com">prestoncarter@givenspursley.com</a>
Edward A. Finklea Director of Natural Gas Alliance of Western Energy Consumers 545 Grandview Drive Ashland, OR 97520 <a href="mailto:efinklea@awec.solutions">efinklea@awec.solutions</a>	

  
Jonathan J. Cavanagh