

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of )  
 WASHINGTON NATURAL GAS COMPANY for a )  
 Certificate of Public Convenience and ) CAUSE NO. U-9692  
 Necessity to Operate a Gas Plant for )  
 Hire in the general area or areas of ) ORDER  
 Snohomish, King, Pierce, Thurston, )  
 and Lewis Counties. )  
 . . . . . )

In the Matter of the Application of )  
 the CITY OF ENUMCLAW, a Municipal )  
 Corporation, for a Certificate of ) CAUSE NO. U-9702  
 Public Convenience and Necessity to )  
 Operate a Gas Plant for Hire in the ) ORDER  
 general area or areas of the City of )  
 Enumclaw. )  
 . . . . . )

In the Matter of the Application of )  
 the TOWN OF BUCKLEY, a Municipal )  
 Corporation, for a Certificate of ) CAUSE NO. U-9703  
 Public Convenience and Necessity to )  
 Operate a Gas Plant for Hire in the ) ORDER  
 general area or areas of the Town of )  
 Buckley. )  
 . . . . . )

This matter came on regularly for hearing at Olympia, Washington, on July 25, 1966, pursuant to order consolidating the proceedings and on notice duly given, before Chairman Francis Pearson, Commissioner Patrick D. Sutherland, Commissioner Dayton A. Witten, and Examiner Elmer E. Johnston.

The parties were represented as follows:

PETITIONER: WASHINGTON NATURAL GAS COMPANY By HUGO E. OSWALD, JR., Attorney at Law, 1300 IBM Building, Seattle, Washington.

THE CITY OF ENUMCLAW and THE TOWN OF BUCKLEY, by PHILIP E. BIEGE, City Attorney for the City of Enumclaw and Town of Buckley.

COMMISSION: THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, by FRANK P. HAYES, Assistant Attorney General, Temple of Justice, Olympia, Washington.

The Washington Natural Gas Company on May 19, 1966, filed an application to amend its present Certificate of Convenience and Necessity to Operate a Gas Plant for Hire, Certificate No. 2, to include the Town of Orting and contiguous areas, and a sizable area southeast of Auburn to Buckley and Enumclaw.

Washington Natural Gas Company is a corporation with many years of gas-for-hire experience with a staff of employees numbering nearly 750 persons, serving 130,000 customers with 37,000 miles of main and service pipe installed in the state. It has skilled personnel, excellent equipment, modern testing procedures and safety practices and operates under rules of the Commission, for public safety in the construction and operation of facilities, and for the transmission, sale and distribution of gas. Based on the financial condition as shown by the Company's balance sheet as of March 31, 1966, Washington Natural should have no trouble financing the cost of constructing plant facilities in the additional service area. Furthermore the main transmission pipeline of El Paso Natural Gas Company passes through a portion of the requested area.

The evidence establishes that there is active expansion and growth in the district around Orting and from Enumclaw on to Black Diamond and the area east of the Green River. There are a number of new homes being built and substantial residential projects planned along with commercial and industrial places of business. There is now and will be, a need and demand for natural gas in this area. The economic feasibility study filed with the Commission as Exhibit No. 7 supports this fact. However, there is an absence of evidence in the record indicating growth or need in the area immediately west of Buckley toward Orting.

Washington Natural in its application for this new area overlapped and included therein territory now being served by the City of Enumclaw over a distance of about 11 miles lying between the city and the main pipeline of El Paso Natural Gas Company near the Auburn Academy center in southeast King County. Thereupon the City of Enumclaw - a city of approximately 3,700 population - on June 16, 1966, filed its application with the Washington Utilities and Transportation Commission, for a certificate of convenience and necessity for the city and specific outside market area including its main pipeline and laterals installed therein. It also protested the application of Washington Natural Gas Company for the right to serve the territory overlapped in its application.

It was established by the evidence that at the time natural gas service would be made available in the Puget Sound area no gas company was ready and willing to provide natural gas service to the City of Enumclaw. Officials of the city were of an opinion natural gas service was necessary for the welfare of Enumclaw and if private utilities were not interested in providing natural gas service, the city should take the required steps for a municipal gas system. The city began its gas project with public support in 1954 and on January 11, 1955, adopted a comprehensive plan for the acquisition and construction of a natural gas utility by Ordinance No. 648, which was subsequently approved by the voters on March 8, 1955. The project included a gas system in the corporate limits of the city and in the residential market areas outside and adjacent thereto. Bonds were sold and construction commenced and the main transmission line installed from the El Paso mainline. Laterals

were subsequently laid in and out of the city and there were at the time of the hearing 272 customers outside of the corporate limits and 761 within the city proper. The Enumclaw vicinity is growing and the council is preparing to supply gas service to additional customers. The city has no producing gas plant and all gas distributed through the system is purchased from El Paso Natural Gas Company at the Auburn Academy meter tap station. The city gas department has four men.

The Town of Buckley with approximately 3,500 inhabitants, on June 16, 1966, filed its application with the Commission for a certificate of convenience and necessity for the town proper, and for specific growth area west and southwest of town which it seeks to include in its certificate. Buckley protests the application of Washington Natural for the overlapped outside market area.

The Town of Buckley took the same position as Enumclaw where there was no other gas utility service available and there was a growing need for natural gas and public interest and convenience required the town to operate a natural gas utility system for the people living there. So, in a way, Buckley cooperated with Enumclaw in a joint venture and laid out a plan to furnish its inhabitants and others with gas by enacting Ordinance No. 589 on September 14, 1954, with voter approval on November 2, 1954. The bonds were sold and work on the utilities system was commenced with a main pipeline from Enumclaw to Buckley and distribution mains and laterals in the town. Buckley operates a small gas department. There are 402 customers in the town and only two on the outside.

Up to the time of these proceedings neither the City of Enumclaw nor the Town of Buckley had applied for a certificate of convenience and necessity from the Washington Utilities and Transportation Commission. Both municipal corporations now seek certificates which include outside adjacent areas in each application, where customers are now being served by the municipality.

The first question presented is whether a municipal corporation is required to obtain from the Washington Utilities and Transportation Commission a certificate of public convenience and necessity prior to the operation of a gas distribution system. The question is answered in the affirmative for the reasons set forth herein. RCW 80.04.010 defines a gas company to include every city and town "owning, controlling, operating or managing a gas plant within this state." RCW 80.28.190 provides that no gas company shall, after January 1, 1956, operate in this state any gas plant for hire without first having obtained from the Commission under the provisions of this act a certificate declaring that public convenience and necessity requires or will require such operation. . . The law granting gas company certificates thus provides that the Washington Utilities and Transportation Commission shall have jurisdiction over cities and towns in the operation of a gas system to prevent unnecessary duplication of facilities. Even though by RCW 80.04.500 its jurisdiction is otherwise restricted, it may attach

terms and conditions to such certificate as in the judgment of the Commission the public convenience and necessity may require.

Under the law both Enumclaw and Buckley have the right to operate utilities. RCW 35.92.050 provides as follows:

"A city or town may also construct, condemn and purchase, purchase, acquire, add to, maintain and operate works, plants, facilities for the purpose of furnishing the city or town and its inhabitants, and any other persons, with gas, electricity, and other means of power and facilities for lighting, heating, fuel, and power purposes, public and private, with full authority to regulate and control the use, distribution, and price thereof. . . and purchase gas, electricity, or power from either within or without the city or town for its own use and for the purpose of selling to its inhabitants and to other persons doing business within the city or town and regulate and control the use and price thereof."

Enumclaw, a third class city, also has the following specific statutory authority: RCW 35.24.410:

"The city council of every city of the third class may contract for supplying the city with water, light, power, and heat for municipal purposes; and within or without the city may acquire, construct, repair, and manage pumps, aqueducts, reservoirs, plants, or other works necessary or proper for irrigation purposes or for supplying water, light, power or heat or any by-product thereof for the use of the city and any person within the city and dispose of any excess of its supply to any person without the city."

It can be seen from the above-quoted statutes that both municipalities are authorized by law to finance and install a gas system, including the buying of a right-of-way and laying a transmission line to each city and town to meet present and future needs and to distribute gas to inhabitants.

The main question in these proceedings is whether a municipality may sell gas outside its corporate limits or in other words furnish gas utility service to non-residents.

A consideration of the entire record herein establishes the fact, and we so find, that the installation and expansion by Enumclaw of its plant outside its corporate limits was and is ancillary to its primary objective of efficiently providing for natural

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gas service within the city. The record demonstrates that to get a supply of natural gas to the city it was necessary to construct a line to a point of connection with the wholesale supplier. There is no evidence such line was installed with greater capacity than that called for by prudent planning. Service off such line to customers adjacent thereto outside the city limits was the only practicable manner by which such customers could receive gas service and presents no obstacle to the rendering of efficient service within the city. In fact service to customers along the line obviously contributes to support an investment that was necessary in order to get a supply of gas within the city. Persons located along or near the Enumclaw lateral are not located so remotely from Enumclaw as to exclude them from business ties within Enumclaw.

From cases cited in the briefs the Commission is of the opinion that the case of Municipal League of Bremerton vs. City of Tacoma, 166 Wash. 82, expresses the law that should govern the Commission in this case along with the specific statutory authority above referred to. The disposition we make herein in opinion is in accord therewith.

There is another essential element to be considered and that is the limited authority of the Commission under RCW 80.28.190 to issue a certificate for a territory already being served by a certificate holder, without finding that the present gas company will not provide satisfactory service. The above-quoted statute provides in part as follows:

"The Commission shall have power after hearing when the applicant requests a certificate to render service in an area already served by a certificate holder under this Chapter only when the existing gas company or companies serving such area will not provide the same to the satisfaction of the Commission."

While it is true that Enumclaw and Buckley are not certificate holders, yet on the other hand anytime during the construction period or the operating years the cities were entitled to certificates upon application to the Commission. However, both municipalities proceeded in good faith under the impression that none was required apparently since both had been working on the projects in 1954 and 1955 before the law became effective, January, 1956.

There is no evidence that Enumclaw or Buckley have failed to provide service to the satisfaction of the customers on their systems. In fact the reverse is true as the testimony indicates that the customers were pleased with the natural gas service in both municipalities.

The evidence shows that there was a need for gas utility service in 1954 and early 1955 when the people voted a bond issue and bound themselves by ordinance to pay for natural gas service.

The demand is there and customers are being added each month to the systems. For a number of years municipal service has been provided by Enumclaw and Buckley for approximately 1,435 customers.

Under the law as we interpret it and from the facts in the record the Commission could not now find that public convenience and necessity requires that another gas company be certified for the area already being served outside the municipality. However, it does require the issuance of a certificate to Washington Natural Gas Company for a substantial area now in issue before the Commission.

Enumclaw should be issued a certificate not only for its corporate limits but also for such additional service area presently served, but not otherwise in the area for which there are contesting applications. For that part of the contested area Enumclaw's certificate should be limited to an area already being served or in reasonable proximity to its transmission line connecting with the El Paso line. Enumclaw has not demonstrated any substantial program for serving in that area, locations other than those presently served or similarly situated. The legal description set out in Order Paragraph 2 is designed to encompass such an area in a reasonably practical manner.

Buckley likewise should be issued a certificate covering its city limits as they now exist. Its certificate for area beyond its city limits should be limited to that within which it presently serves, and to the community outside where by annexation or otherwise it presently intends to provide substantial service. The legal description set out in Order Paragraph 3 is designed to encompass such area.

Except for the property under consideration south and west of Buckley where there is no present plan for expansion or development the remainder of areas in the applications that are before us should be included in an amended certificate to Washington Natural Gas Company. Paragraph 1 of the Order contains the legal description of the area to be added to the Washington Natural Gas Company's amended certificate.

With reference to the request to duplicate certain territory already served by Enumclaw (even if legally permissible) this could lead to an uneconomic duplication of service that would not be in the best interests of Washington Natural, Enumclaw or the public in the area. We therefore find the public interest will best be served by the avoidance of such dual certification.

#### FINDINGS OF FACT AND CONCLUSIONS OF LAW

Having heard the testimony and considered the record in these proceedings the Commission makes and enters the following findings of fact. Those portions of the preceding summary pertaining to and in support of these ultimate findings are adopted by reference and incorporated herein.

1. The Washington Natural Gas Company operates a gas plant for hire in this state and is subject to the jurisdiction of the Commission.

2. The Washington Natural Gas Company has heretofore been issued Certificate of Public Convenience and Necessity to Operate a Gas Plant for Hire No. 2, as amended December 15, 1965, in Cause No. U-9648.

3. Washington Natural Gas Company seeks to amend its present Certificate of Public Convenience and Necessity to include the Town of Orting, and additional areas in portions of King and Pierce Counties southeast of Auburn toward the towns of Buckley and Wilkeson and north and west of Enumclaw.

4. Additional areas requested are contiguous to the company's present service areas.

5. At present there is no gas company operating a gas plant for hire in the area except the overlapping territory now being served by Enumclaw and Buckley.

6. Washington Natural Gas Company can obtain an adequate source of natural gas and has the finances, skill and ability to install plant facilities to make natural gas service available in the territory applied for.

7. There is present and future need for natural gas and it is, or will be, required by the public convenience and necessity in the requested area as applied for by Washington Natural Gas Company except the overlapping area being served by Enumclaw and Buckley and further there is no present or future expansion or growth indicated or need for gas service shown for the area immediately south of and west of Buckley toward the Town of Orting.

8. The Certificate of Public Convenience and Necessity presently held by the Washington Natural Gas Company should be amended to include the additional area requested as set forth in Findings No. 7 above.

The Commission further finds:

9. That the City of Enumclaw is a municipal corporation of the third class with a population of some 3,700 people and operates a gas plant for hire both within and without its corporate limits.

10. The city embarked on a plan to supply natural gas to its inhabitants and those in the adjacent market area, when no private gas company was interested, during the winter months of 1954 - 1955. Thereafter over a period of time a right-of-way was acquired and 11 miles of main transmission line built along with laterals in and out of the city. Bonds were sold to finance the

project and for several years the City of Enumclaw has been serving natural gas to some 761 city inhabitants and 272 outside customers.

11. The City of Enumclaw on June 16, 1966, made application for a certificate to operate a gas plant for hire in Enumclaw and adjacent area.

12. The city is willing and anxious to continue such service with financial ability to continue the source of supply, and to operate with a competent staff, using modern safety methods and equipment.

13. That public convenience and necessity requires or will require such service in the City of Enumclaw and the adjoining market area now being served and along the transmission line passageway from the city to the El Paso meter station including the Auburn Academy area.

14. That Enumclaw, a third class city, is entitled to a Certificate of Public Convenience and Necessity for the city and adjoining area in which are located its customers outside the corporate limits.

The Commission further finds:

15. Buckley is a town with a population of 3,500 and operates a gas plant for hire within its corporate limits.

16. When the need for natural gas service developed with no prospects for such service available, on September 14, 1954, the town council passed an ordinance which was approved by the voters on November 2, 1954. By progressive steps thereafter contracts were made, bonds authorized, right-of-way acquired, transmission line and laterals installed and in due time a natural gas service was made available to 402 residents of the town and for customers outside.

17. The Town of Buckley, along with the City of Enumclaw, on June 16, 1966, filed its application for a certificate to operate a gas plant for hire in Buckley and adjacent area.

18. Buckley is presently serving natural gas to approximately 400 town customers and is willing and anxious to continue to serve them. The town is financially able to maintain its adequate source of supply and to employ standard safety devices, hire a competent staff and use equipment needed for the work.

19. A gas plant 'for hire' is and will be required by the public convenience and necessity in the Town of Buckley and by the customers presently being served by Buckley outside its corporate limits.

20. That the Town of Buckley is entitled to a Certificate of Public Convenience and Necessity for the town and the area in which customers are located outside the corporate limits.



O R D E R

1. IT IS HEREBY ORDERED That the application of Washington Natural Gas Company to amend its present Certificate of Public Convenience and Necessity to Operate a Gas Plant for Hire to encompass communities southeast of Puyallup including the Town of Orting, thence toward Buckley, and from Enumclaw north including Black Diamond valley contiguous to applicant's certified gas service areas in Pierce and King Counties, be granted with the following territory added thereto:

Portions of Pierce and King Counties described as follows:

Beginning at the point where the El Paso Natural Gas Company Transmission Line intersects the north line of Sec. 27, T. 21 N., R. 5 E.W.M.; thence southerly following said Transmission Line to a point 600 feet from the Enumclaw Gas Transmission Lateral, such 600 feet measured northerly from a point where said Lateral parallels State Highway 167; thence southeasterly and east paralleling the Enumclaw Lateral at a distance of 600 feet through Secs. 27, 34, 35 and 36, T. 21 N., R. 5 E., through Secs. 1 and 12, T. 20 N., R. 5 E., and through Secs. 7, 18, 17, 20, 21 and 22, T. 20 N., R. 6 E., to the centerline of said Sec. 22; thence east to the east line of said Sec. 22; thence north along the east line of Secs. 22, 15 and 10, T. 20 N., R. 6 E., to the northeast corner of said Sec. 10; thence east along the south line of Secs. 2 and 1, T. 20 N., R. 6 E., and along the south line of Sec. 6, T. 20 N., R. 7 E., to the southeast corner of said Sec. 6, thence north along the east line of said Sec. 6, and along the east line of Secs. 31 and 30, T. 21 N., R. 7 E., to the northeast corner of said Sec. 30; thence west along the north line of said Sec. 30, along the north line of Secs. 25, 26, 27, 28, 29 and 30, T. 21 N., R. 6 E., and along the north line of Secs. 25, 26 and 27, T. 21 N., R. 5 E., to the point of beginning.

Beginning at the point where State Highway 167 intersects the west line of Sec. 27, T. 21 N., R. 5 E.W.M.; thence southeasterly along said Highway 167 to the centerline of said Sec. 27; thence south along said centerline to a point 600 feet southerly from the Enumclaw Gas Transmission Lateral; thence southeasterly and parallel to said Enumclaw Lateral at a distance of 600 feet through Secs. 27, 34 and 35, T. 21 N., R. 5 E., and through Secs. 2, 1 and 12, T. 20 N., R. 5 E., to the south line of said Sec. 12; thence west along the south line of said Sec. 12 to its southwest corner; thence north along the west line of said Sec. 12 to its northwest corner; thence west along the south line of Sec. 2, T. 20 N., R. 5 E., to its southwest corner; thence north along the west line of said Sec. 2, to its northwest corner; thence west along the south

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line of Sec. 34, T. 21 N., R. 5 E., to its southwest corner; thence north along the west line of said Sec. 34, and along the west line of Sec. 27, T. 21 N., R. 5 E., to the point of beginning,

as further shown on Appendix A-10, Washington Natural Gas Company, attached hereto and by this reference made a part hereof.

All of the incorporated Town of Orting and other portions of Pierce County described as follows:

Beginning at the northwest corner of Sec. 12, T. 19 N., R. 4 E.W.M.; thence east along the north line of said Sec. 12, and along the north line of Secs. 7, 8, 9, 10 and 11, T. 19 N., R. 5 E., to the northeast corner of said Sec. 11; thence south along the east line of said Sec. 11, along the east line of Secs. 14, 23, 26 and 35, T. 19 N., R. 5 E., and along the east line of Sec. 2, T. 18 N., R. 5 E., to the southeast corner of said Sec. 2; thence west along the south line of said Sec. 2, along the south line of Secs. 3, 4, 5 and 6, T. 18 N., R. 5 E., and along the south line of Sec. 1, T. 18 N., R. 4 E., to the southwest corner of said Sec. 1; thence north along the west line of said Sec. 1, and along the west line of Secs. 36, 25, 24, 13 and 12, T. 19 N., R. 4 E., to the northwest corner of said Sec. 12, the point of beginning,

as further shown on Appendix A-11, Washington Natural Gas Company, attached hereto and by this reference made a part hereof.

2. IT IS FURTHER ORDERED That the application of the City of Enumclaw for a Certificate of Public Convenience and Necessity to Operate a Gas Plant for Hire within the city and for limited additional territory adjacent to the city, now being served in a residential market area, be granted as follows:

The City of Enumclaw and additional portions of King County described as follows:

Beginning at the northwest corner of Sec. 27, T. 21 N., R. 5 E.W.M.; thence east along the north line of said Sec. 27 to a point where the El Paso Natural Gas Company Transmission Line crosses said north line; thence southerly following said Transmission Line to a point 600 feet from the Enumclaw Gas Transmission Lateral, such 600 feet measured northerly from a point where said Lateral parallels State Highway 167; thence southeasterly and east paralleling the Enumclaw Lateral at a distance of 600 feet through Secs. 27, 34, 35 and 36, T. 21 N., R. 5 E., through Secs. 1 and 12, T. 20 N., R. 5 E., and through Secs. 7, 18, 17, 20, 21 and 22, T. 20 N., R. 6 E., to the centerline of said Sec. 22; thence east to the east line of said Sec. 22; thence north along the east line of said

Sec. 22, and along the west line of Sec. 14, T. 20 N., R. 6 E., to the northwest corner of said Sec. 14; thence east along the north line of Secs. 14 and 13, T. 20 N., R. 6 E., to the northeast corner of said Sec. 13; thence south along the east line of said Sec. 13, to its southeast corner; thence east along the north line of Sec. 19, T. 20 N., R. 7 E., to its northeast corner; thence south along the east line of said Sec. 19, and along the east line of Sec. 30, T. 20 N., R. 7 E., to the mid-point of the east line of said Sec. 30; thence west along the centerline of said Sec. 30, and along the centerline of Sec. 25, T. 20 N., R. 6 E., to the mid-point of the west line of said Sec. 25; thence southwesterly to the intersection of the west line of Sec. 35, T. 20 N., R. 6 E., with the White River; thence westerly along said river to the centerline of the east half of Sec. 34, T. 20 N., R. 6 E.; thence north to the northwest corner of the northeast quarter of the southeast quarter of Sec. 27, T. 20 N., R. 6 E.; thence west along the centerline of said Sec. 27 to the northwest corner of the northeast quarter of the southeast quarter of Sec. 28, T. 20 N., R. 6 E.; thence north along the centerline of the east halves of Secs. 28 and 21, T. 20 N., R. 6 E., to a point 600 feet south of the Enumclaw Lateral; thence west and northwesterly paralleling said Lateral at a distance of 600 feet, through Secs. 21, 20, 19 and 18, T. 20 N., R. 6 E., through Secs. 13, 12, 1 and 2, T. 20 N., R. 5 E., and through Secs. 35, 34 and 27, T. 21 N., R. 5 E., to a point on the centerline of said Sec. 27, 600 feet southerly from the Enumclaw Lateral; thence north on the centerline of said Sec. 27 to its intersection with State Highway 167; thence northwesterly along said Highway 167 to its intersection with the west line of said Sec. 27; thence north along the west line of said Sec. 27, to its northwest corner, the point of beginning,

as further shown on Appendix A-1, Enumclaw, attached hereto and by this reference made a part hereof.

3. IT IS FURTHER ORDERED That the application of the Town of Buckley for a Certificate of Public Convenience and Necessity to Operate a Gas Plant for Hire within the town limits of Buckley and for a small additional area contiguous thereto presently being served by Buckley, be granted as follows:

The Town of Buckley and additional portions of Pierce County described as follows:

Beginning at the northwest corner of Sec. 4, T. 19 N., R. 6 E.W.M.; thence south along the west line of Secs. 4, 9 and 16, T. 19 N., R. 6 E., to the intersection of said west line with South Prairie Creek; thence easterly following said creek to its intersection with the east line of Sec. 15, T. 19 N., R. 6 E.; thence north along the east

line of Secs. 15 and 10, T. 19 N., R. 6 E., to the intersection with the south limit of the Town of Buckley; thence following said Town limit east, north and westerly along the White River, and south to the intersection of said Town limit with the north line of Sec. 4, T. 19 N., R. 6 E.; thence west to the northwest corner of said Sec. 4, the point of beginning,

as further shown on Appendix A-1, Buckley, attached hereto and by this reference made a part hereof.

4. IT IS FURTHER ORDERED That Certificate No. 2, issued to the Washington Natural Gas Company on December 15, 1965, in Cause No. U-9648, be amended and revised to include the authority granted by this order.

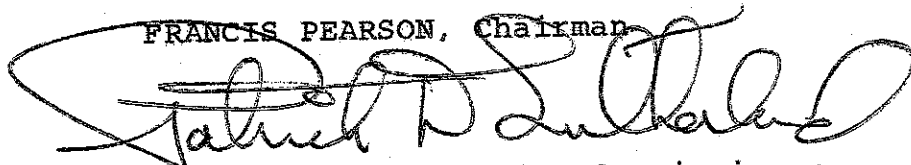
5. IT IS FURTHER ORDERED That jurisdiction over this cause is retained to effectuate the provisions of this order and future consideration to determine alterations, if any, to be made to the Certificates or the amendment issued pursuant to Order Paragraphs Nos. 1-2-3, above, to conform to the requirements of public convenience and necessity as the same may then be made to appear.

DATED at Olympia, Washington, and effective this 2nd day of November, 1966.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



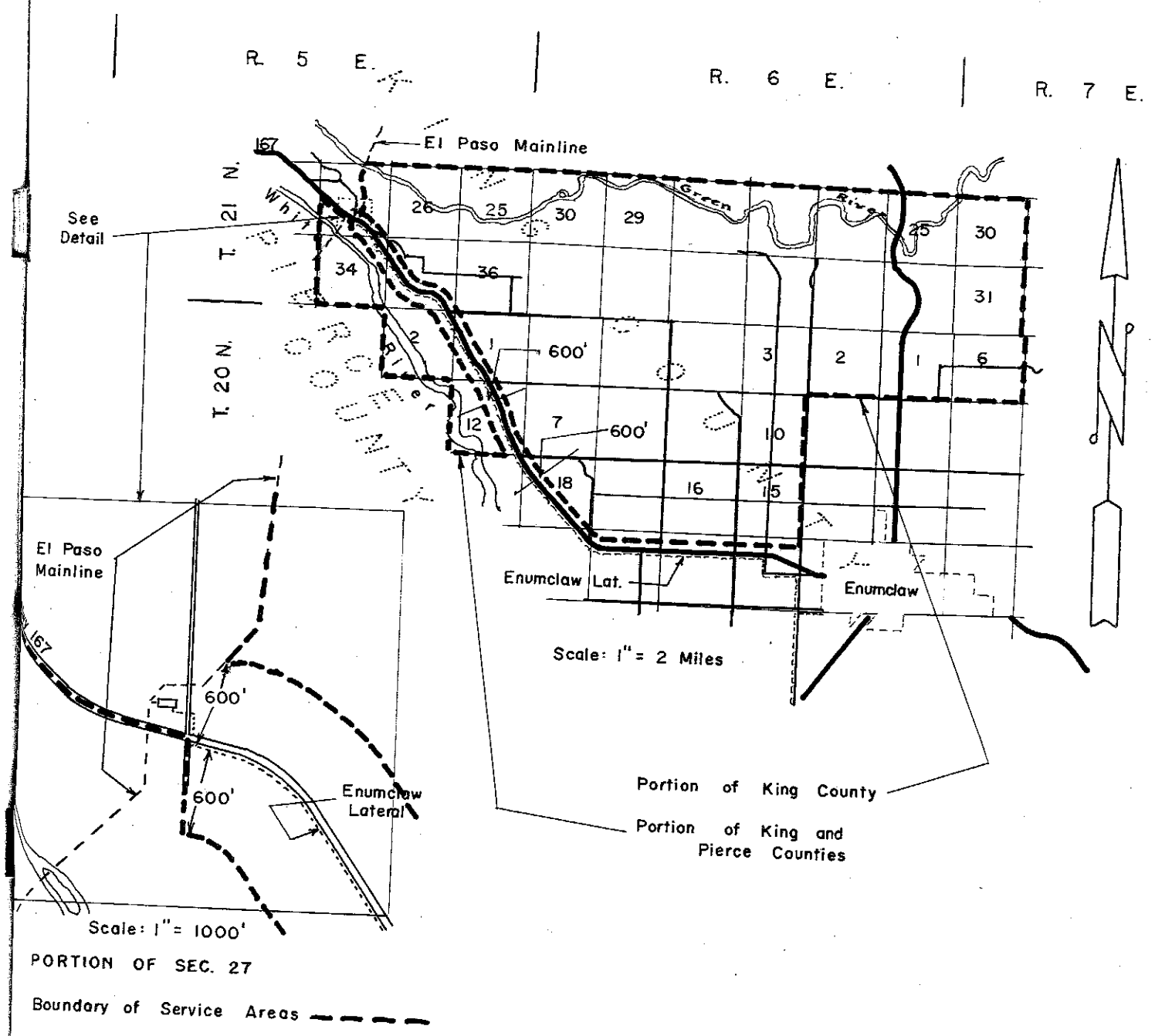
FRANCIS PEARSON, Chairman



PATRICK D. SUTHERLAND, Commissioner



DAYTON A. WITTEN, Commissioner



APPENDIX A-10

CAUSE NO. U-9692

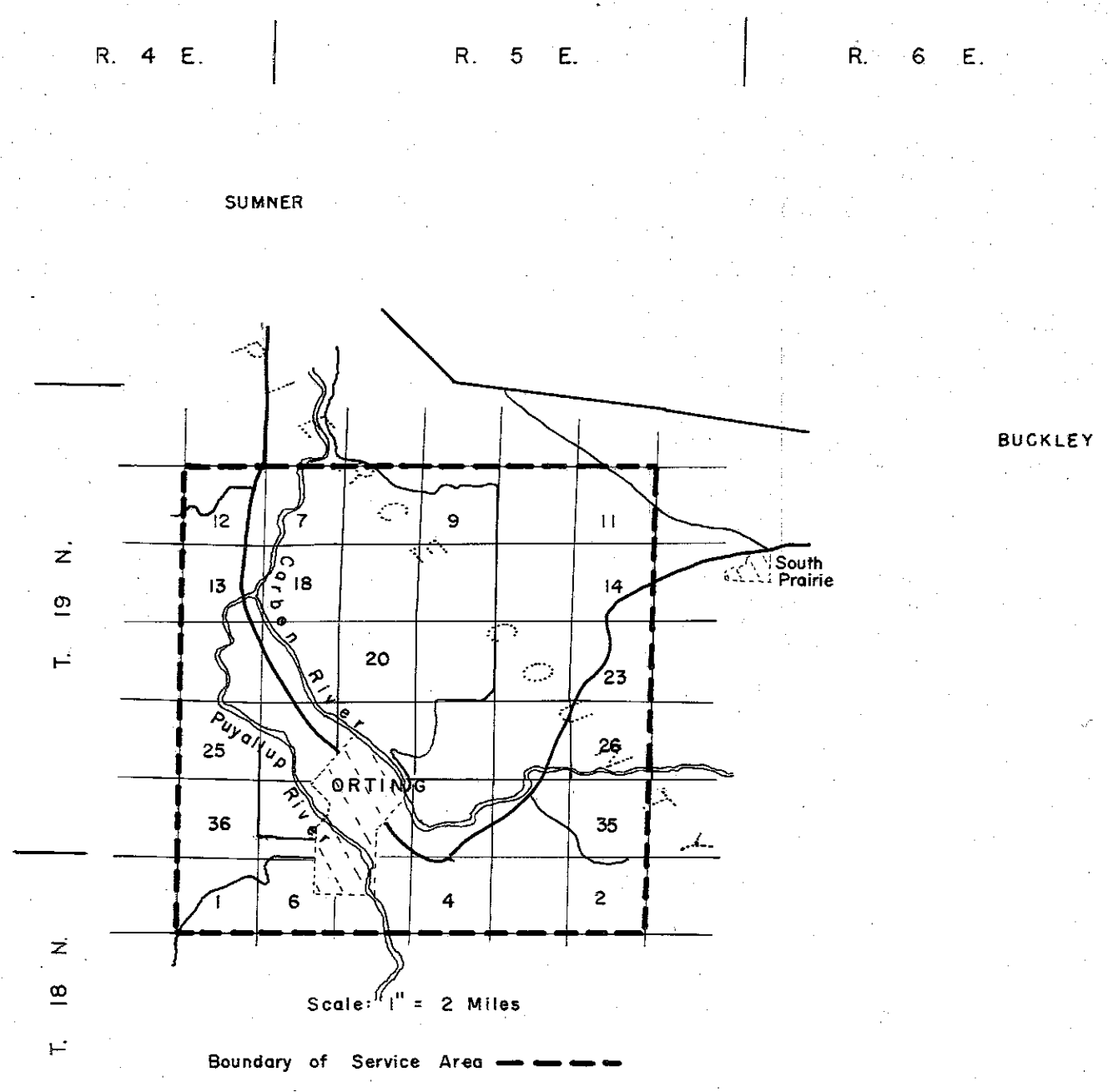
WASHINGTON NATURAL GAS COMPANY

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DATE: NOV. 2, 1966

BY: T.W.

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APPENDIX A-11

CAUSE NO. U-9692

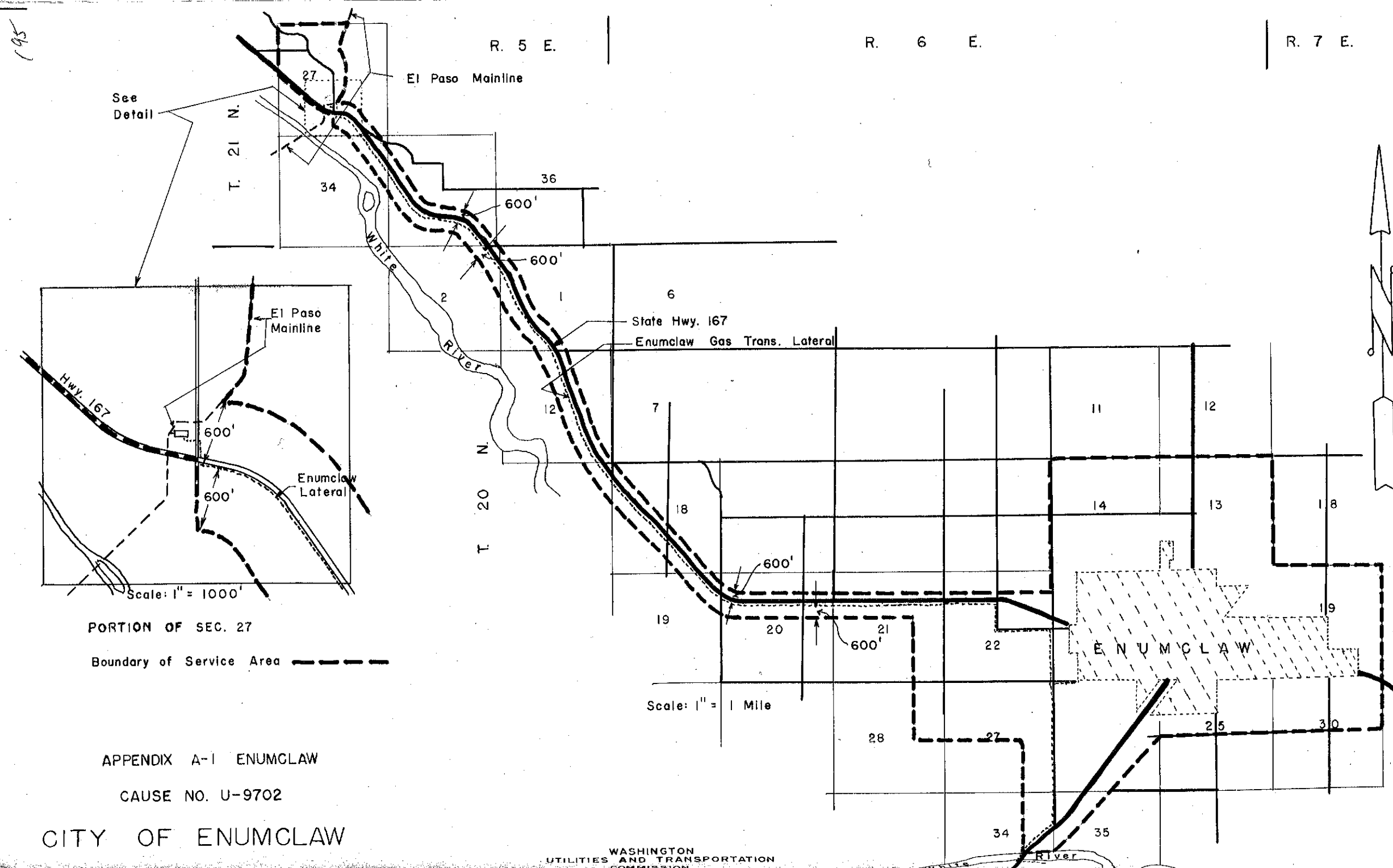
WASHINGTON NATURAL GAS COMPANY

WASHINGTON  
UTILITIES AND TRANSPORTATION  
COMMISSION

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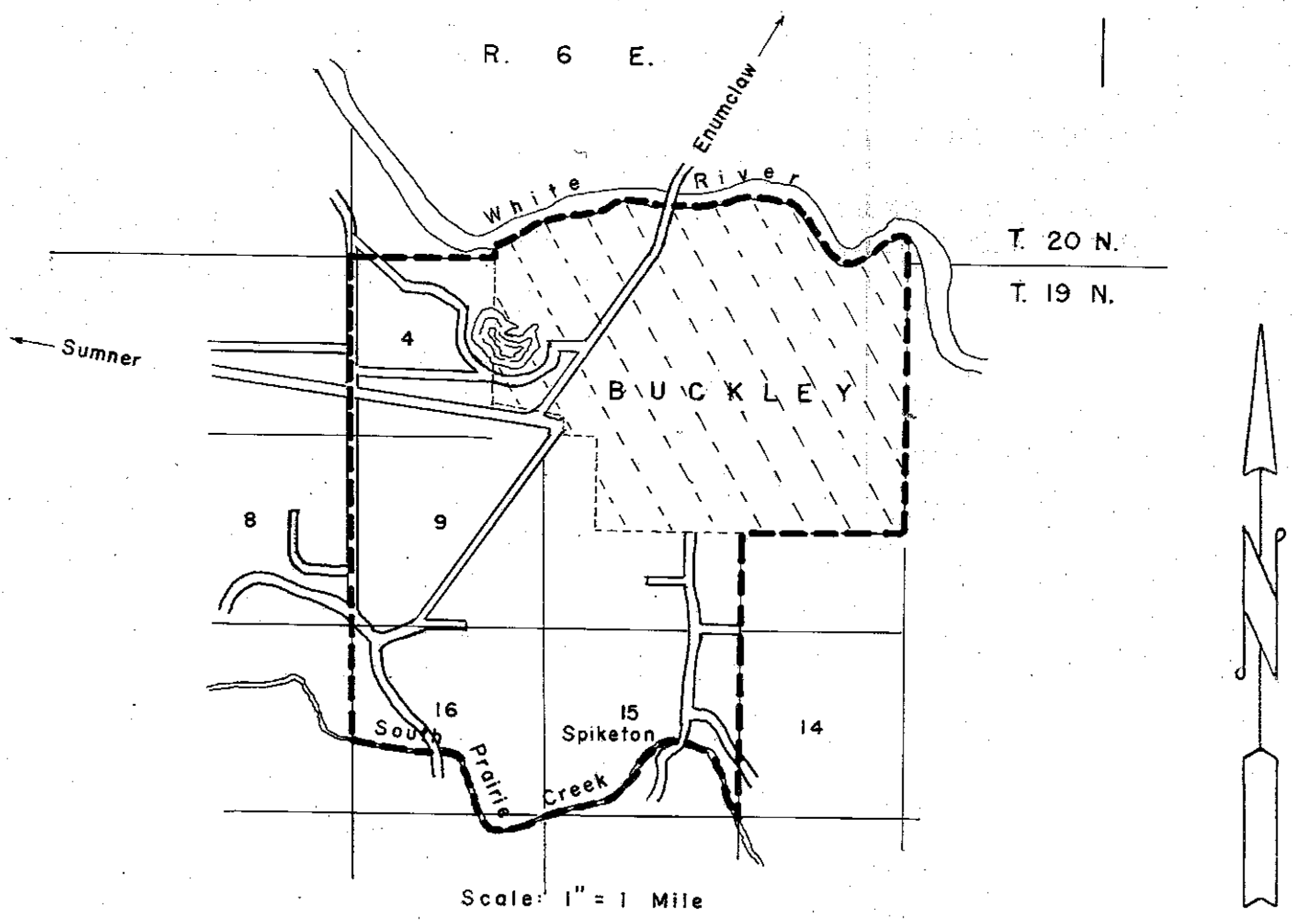
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PORTION OF SEC. 27  
 Boundary of Service Area - - - - -

APPENDIX A-1 ENUMCLAW  
 CAUSE NO. U-9702  
 CITY OF ENUMCLAW

WASHINGTON  
 UTILITIES AND TRANSPORTATION  
 COMMISSION



Boundary of Service Area -----

APPENDIX A-1 BUCKLEY

CAUSE NO. U-9703

TOWN OF BUCKLEY

WASHINGTON  
UTILITIES AND TRANSPORTATION  
COMMISSION

DATE: NOV. 2, 1966

BY: T.W.