

## NATURAL GAS COMPANY

ONE PACIFIC SQUARE 220 N.W. SECOND AVENUE · PORTLAND, OREGON 97209

LAWRENCE REICHMAN Associate Counsel DID: (503) 220-2404 FAX: (503) 721-2516

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January 17, 1996

Steve McLellan Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Pk Dr SW Olympia, WA 98504-0128

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Re: WUTC vs. Cascade Natural Gas Corporation; Petition to Intervene, Docket: UG 951415

Dear Mr. McLellan:

Enclosed are an original and nineteen copies of Northwest Natural Gas Company's Petition to Intervene in Docket No. UG 951415, WUTC vs. Cascade Natural Gas Corporation. A copy of this Petition has been served upon all parties of record in this proceeding.

Please call me if you have any questions.

Sincerely yours,

Lawrence Reichman

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cc: S.K. Ackerman K.H. Evans B.B. Samson Service List c:\...\hr\170

## BEFORE THE WASHINGTON UTILITIES AND

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## TRANSPORTATION COMMISSION

Washington Utilities and Transportation Commission,	)		
Complair vs. Cascade Natural Gas Corpora Respond	) ) ation, ) )	JG-951415 PETITION TO INTERVE	:NE
1. Name and address of p Northwest Natur 220 N.W. Secor Portland, OR 97 Phone Number:	al Gas Company d Avenue	UTIL & TRANS COMMISSION	96 JAN 19 A9
Kyle Evans Financial Rate A	al Gas Company Id Avenue	st:	3 3 3
Phone Number:	(503) 226-4211, Ext.	3583	

2. Name and address of the attorney, if any, representing the petitioner.

Lawrence Reichman Associate Counsel Northwest Natural Gas Company 220 N.W. Second Avenue Portland, OR 97209

Phone Number: (503) 220-2404

- 3. If the petitioner is an organization: Not applicable.
  - a. State the number of members in the organization:
  - b. State the name of the person authorized to sign this petition for the organization:
  - c. Attach a copy of the document authorizing participation in this case or state the basis for the authorization.
  - d. State the purpose of the organization:

4. The petitioner has participated in the following UTC cases in the last two years:

Date: Docket No.: Title of Proceeding:

Petitioner is a natural gas utility that is regulated by the UTC. Although petitioner has not participated in any general rate cases or other litigated cases in the past two years, petitioner has filed Purchased Gas Adjustments, technical rate adjustments, and other sorts of periodic filings.

5. The petitioner has the following interest in this proceeding:

Northwest Natural Gas Company also is a natural gas utility operating in Washington and has an interest in the issues of rate design, cost allocation, rate of return, and the treatment of special contract revenues that are raised in this proceeding. NNG and its customers have an interest in the outcome of this proceeding that cannot be adequately represented by any other party to this proceeding.

6. The petitioner will raise the following issues in this case:

NNG does not intend to raise any specific issues at this time, but reserves its right to respond as the record develops.

7. The petitioner intends to:

- \_\_\_\_\_a. Submit written testimony and exhibits of the following people: None at this time.
- b. Call the following witnesses to testify:

None at this time.

X c. Cross-examine the witnesses called by other parties:

Possibly.

<u>X</u> d. Submit written arguments and/or motions:

Possibly.

8. I submit this Petition to Intervene and request authorization to participate in this proceeding.

Signature of Petitioner, authorized representative of petitioner, or attorney for petitioner.

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Date

STATE OF SS. Ult COUNTY

I, <u>Caurence</u> <u>Reichman</u>, affirm that this petition is true and complete to the best of my knowledge and belief.

Signature of petitioner, or attorney for petitioner.

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Petition to

Intervene upon all parties of record in Docket UG-951415 by mailing a copy thereof,

properly addressed with first-class postage prepaid, to the parties or attorneys of parties

on the following list:

John T. Stoltz Senior Vice President **Cascade Natural Gas** Rates and Planning PO Box 24464 Seattle, WA 98124

Jeffrey Goltz Assistant Attorney General Washington Utilities and Transportation Commission State Mail Stop 40128 1300 S. Evergreen Pk Dr SW Olympia, WA 98504-0128

John L. West Miller Nash Wiener Hager & Carlsen 4400 Two Union Square 601 Union Street Seattle, WA 98101

Robert F. Manifold Assistant Attorney General Office of the Attorney General Public Counsel 900 4th Avenue Suite 2000 Seattle, WA 98164

DATED this 17th day of January, 1996.

NORTHWEST NATURAL GAS COMPANY

By:

Lawrence Reichman Associate Counsel

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