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PAULA E. PYRON

January 10, 1996

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

Mr. Steve McLellan, Secretary
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504

Re: <u>WUTC v. Cascade Natural Gas Corporation</u>, Docket Nos. UG-951415 and UG-950326 (Consolidated), Petition to Intervene of the Northwest Industrial Gas Users

Dear Mr. McLellan:

Enclosed for filing in Docket Nos. UG-951415 and UG-950326 (Consolidated), please find the original and nineteen copies of the Petition to Intervene of the Northwest Industrial Gas Users.

One additional copy of the Petition is enclosed to be filestamped and returned to us for our records in the enclosed, selfaddressed postage, prepaid envelope.

If you have any questions regarding this filing, please call me at (503)228-2525. Thank you for your assistance with this matter.

Very truly yours,

Paula E. Pyron

Counsel for the Northwest

Industrial Gas Users

Enclosures

cc w/enc.: All Parties of Record

M.A. Hutton

BEFORE THE WASHINGTON UTILITIES AND

TRANSPORTATION COMMISSION

In Re the Petition of	
CASCADE NATURAL GAS CORPORATION	Docket No. UG-951415 and UG-950326
For an Order Determining the Ratemaking Treatment of Certain	(Consolidated)
Special Contracts	PETITION TO INTERVENE
)
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	55 J
Complainant,)	
v. (
CASCADE NATURAL GAS CORPORATION,	III AANSA. 03
Respondent.	man Man

PETITION TO INTERVENE OF THE NORTHWEST INDUSTRIAL GAS USERS

Pursuant to Washington Administrative Code 480-09-430(1)(a), the Northwest Industrial Gas Users (NWIGU) hereby petition the Washington Utilities and Transportation Commission (WUTC) for leave to intervene in the above-captioned consolidated proceedings. In support of this Petition, NWIGU states as follows:

1. The following person should be included on the official list of parties of record in these proceedings, and all correspondence and communications concerning these proceedings should be addressed to:

Mary Ann Hutton Executive Director Northwest Industrial Gas Users 9999 NE Worden Hill Rd. Dundee, OR 97115-9147 (503) 538-0600 (503) 538-0603 Fax

2. The following attorneys should be included on the official list of parties of record in these proceedings, and all correspondence and communications concerning these proceedings should be addressed to:

Edward A. Finklea
Paula E. Pyron
Ball, Janik & Novack
101 SW Main Street
Suite 1100
Portland, OR 97204-3274
(503) 228-2525
(503) 226-3910
Counsel for NWIGU

3. The NWIGU is a nonprofit association comprised of 35 industrial end users of natural gas with major facilities in the states of Washington, Oregon and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, aluminum, steel, chemicals, electronics, and aerospace. The association provides an information service to its members and participants in various regulatory matters that affect member interests.

Counsel for NWIGU is authorized to intervene on behalf of NWIGU in these proceedings by NWIGU and its Executive Director.

4. NWIGU regularly participates in rate and tariff proceedings of local distribution companies in the State of

Washington that affect its members' interests, including proceedings involving Cascade Natural Gas Corporation (Cascade or the Company).

- 5. Several NWIGU member companies purchase natural gas services from Cascade under various rate schedules, including transportation service. On December 11, 1995 in Docket No. UG-951415, Cascade filed a request for a general rate increase with additional operating revenues sought of \$5,743,152, a revenue increase of 3.46%. With its filing in this case, Cascade submitted a cost-of-service study and proposed to change the spread of its revenue requirement among its customer classes to reflect more cost-based rates. On December 27, 1995, the Commission entered an order in Docket No. UG-951415 suspending the operation of the proposed tariff revisions and setting them for hearing. In addition on December 27, 1995, the Commission consolidated this general rate case proceeding with Cascade's petition for determining ratemaking treatment for its special contracts in Docket No. UG-950326.
- 6. Since members of NWIGU acquire services from Cascade, they are directly and immediately affected by the outcome of these proceedings. No other party purports to represent the interests of the NWIGU.
- 7. NWIGU reserves the right to address any and all issues that affect an industrial customer of Cascade under the proposed tariff revisions, general rate increase and petition for determining ratemaking treatment for special contracts filed by

the Company. These issues would include, but not be limited to, the appropriate rate design for any allowed general rate increase, the appropriate cost-of-service methodology for Cascade, the appropriate revenue requirement for the Company, and the appropriate rate design and operating provisions for industrial sales and transportation services offered by Cascade.

8. NWIGU reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in these proceedings.

WHEREFORE, based upon the foregoing, the NWIGU seek approval of this Petition to Intervene as a party in these consolidated proceedings, with all the procedural and substantive rights associated with party status.

DATED the 107h day of January, 1996.

Respectfully submitted,

Edward A. Finklea

Paula E. Pyron

Counsel for the Northwest Industrial Gas Users

Ball, Janik & Novack

101 SW Main Street

Suite 1100

Portland, OR 97204-3274

(503) 228-2525

(503) 226-3910 Fax

STATE OF OREGON) ; ss. COUNTY OF MULTNOMAH)

I, Paula E. Pyron, counsel for the Northwest Industrial Gas Users, affirm that this Petition is true and complete to the best of my knowledge and belief.

DATED this 10th day of January, 1996.

Paula E. Pyron

Counsel for the Northwest Industrial Gas Users

Sworn and subscribed to before me this /Oth day of January, 1996.

OFFICIAL SEAL
KIMBERLY K. LITCHMAN
NOTARY PUBLIC - OREGON
COMMISSION NO.022636
MY COMMISSION EXPIRES MAY 20, 1997

Notary Public for Oregon
My Commission Expires: 5-20-97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in these consolidated proceedings by placing a true copy of the document properly addressed to each party in the United States mail first class postage prepaid.

Dated at Portland, Oregon, this 1996.

Paula E. Agran
Paula E. Pyron