BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION **Complainant** **v.** **CASCADE NATURAL GAS CORPORATION,** **Respondent**	**DOCKET PG-230800** **PETITION TO INTERVENE OF SAPPHIRE GAS SOLUTIONS LLC**

Sapphire Gas Solutions LLC ("Sapphire") respectfully petitions to intervene in the above matter pursuant to WAC-480-07-355, and in doing so states as follows:

1) Sapphire's address is:
100 Interstate 45 N
Conroe, TX 77301

Sapphire may be served through its counsel.

2) The Commission alleges in the Complaint that Sapphire had a role in at least one of the alleged Causes of Action. Sapphire has a substantial interest in participation as an intervenor in this matter to protect its interests and has information that would be valuable to the Commission. Sapphire's participation in this proceeding would be in the public interest.

Sapphire's business includes providing mobile and temporary LNG facilities to gas pipeline customers for maintaining supply during the repair or maintenance of their gas pipeline systems. These activities are regulated under the LNG facility standards in 49 CFR part 193 which has been incorporated by reference in the Commission's regulations. Sapphire was contracted by Cascade Natural Gas Corporation ("Cascade") to provide mobile LNG services in Toppenish, Washington and had personnel and equipment present at the subject worksite on September 22, 2023.

The Commission should allow Sapphire to intervene in this matter for the following reasons:

a) Sapphire has direct knowledge of facts underlying the claims brought by the Commission, including additional noncumulative information beyond that possessed by Respondent, which will contribute positively to the Commission's understanding and evaluation of the issues;

b) The Commission's Complaint is predicated, in part, on information previously provided by Sapphire;
c) Sapphire's participation will improve the Commission's ability to promptly and orderly conduct the proceeding;
d) At least one of the Commission's causes of action is based in part on the alleged actions of Sapphire or Sapphire's contractors;
e) Cascade has informed Sapphire that each of the causes of action alleged by the Commission are Sapphire's responsibility;
f) The Complaint alleges in paragraph 4 that pursuant to the gas pipeline regulations Cascade maintains responsibility for contractors, such as Sapphire;
g) Sapphire periodically provides LNG services in the State of Washington and has a substantial interest in ensuring the correct application of regulatory requirements to its operations, including requirements relating to mobile LNG operations;
h) Respondent Cascade has demanded a defense and indemnification from Sapphire for any penalties Cascade is subject to in this matter, so Cascade does not have the same interest in defending the Complaint as Sapphire does. Cascade has demanded that Sapphire pay any penalty that the Commission orders as a result of this Complaint; and
i) Sapphire has an interest in defending the complaint and causes of action arising under part 193 since Sapphire conducts operations under the part 193 LNG regulations.

3) Sapphire's position in this matter is expected to be in defense of the Complaint and opposite the Commission. Sapphire seeks to intervene to defend the enforcement action that Cascade alleges is based on Sapphire's actions. Sapphire believes that the complaint does not correctly apply Washington law and regulations, nor parts 192 and 193, and seeks the opportunity to present those arguments to the Commission.

4) Sapphire does not propose to broaden the issues in the proceeding, but reserves all rights with respect to raising any available defenses to the causes of action alleged in the complaint. At this time, Sapphire does not intend to call any witnesses at the hearing, but reserves the right to do so should legal arguments and witnesses brought by the primary parties result in the presentation of witnesses by Sapphire being helpful to the Commission.

5) Sapphire's attorneys, who are formally appearing concurrent with this petition, are:

George O. Wilkinson
Kevin A. Moscon
Vinson & Elkins LLP
845 Texas Ave.
Suite 4700
Houston, TX 77002
Tel. 713.758.4834
Fax 713.615.5142
gwilkinson@velaw.com
kmoscon@velaw.com

6) WHEREFORE, Sapphire prays that it be permitted to participate as an intervenor in this matter before the Commission.

Dated this 22nd Day of April, 2025

_/s/ George O. Wilkinson_____
George O. Wilkinson TX: 21492850
Kevin A. Moscon TX: 24121024
Attorneys for Sapphire Gas Solutions LLC