

HELLER, EHRMAN, WHITE & McAULIFFE

ATTORNEYS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

333 BUSH STREET
SAN FRANCISCO, CALIFORNIA 94104-2878
FACSIMILE (415) 772-6268
TELEPHONE (415) 772-6000

3505 FIRST INTERSTATE BANK TOWER · 1300 S. W. FIFTH AVENUE
PORTLAND, OREGON 97201-5696
TELEPHONE (503) 227-7400 · FACSIMILE (503) 241-0950

525 UNIVERSITY AVENUE
PALO ALTO, CALIFORNIA 94301-1908
FACSIMILE (415) 324-0638
TELEPHONE (415) 326-7600

555 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90071-2306
FACSIMILE (213) 614-1868
TELEPHONE (213) 689-0200

701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7098
FACSIMILE (206) 447-0849
TELEPHONE (206) 447-0900

August 24, 1992

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

Mr. Paul Curl, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
Olympia, WA 98504-7250

Re: Petition to Intervene of the Northwest Industrial Gas
Users in Washington Natural Gas Company, Docket No. UG-
920840

Dear Mr. Curl:

Enclosed please find the original and 19 copies of the
Petition to Intervene of the Northwest Industrial Gas Users for
filing in the above referenced docket. One additional copy is
enclosed to be file-stamped and returned to us for our records.

Thank you for your assistance with this matter.

Very truly yours,



Paula E. Pyron

PEP/kkl
cc: M.A. Hutton w/enc.
Interested Parties of Record

RECEIVED
92 AUG 25 A9:10
STATE OF WASHINGTON
UTILITY AND TRANSPORTATION
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	Docket No.
)	UG-920840
Complainant,)	
)	PETITION TO
v.)	INTERVENE
)	
WASHINGTON NATURAL GAS COMPANY,)	
)	
Respondent.)	

PETITION TO INTERVENE OF NORTHWEST INDUSTRIAL GAS USERS

Pursuant to Washington Administrative Code 480-09-430(a), the Northwest Industrial Gas Users (NWIGU) hereby petition the Utilities and Transportation Commission (WUTC) for leave to intervene in the above-captioned proceeding. 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 this proceeding, and all correspondence and communications concerning this proceeding 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 this proceeding, and all

correspondence and communications concerning this proceeding should be addressed to:

Edward A. Finklea
Paula E. Pyron
Heller, Ehrman, White & McAuliffe
1300 SW 5th Ave., Suite 3400
Portland, OR 97201
(503) 227-7400
(503) 241-0950 Fax
Counsel for NWIGU

3. The NWIGU is a nonprofit association comprised of 41 industrial end users of natural gas with major facilities in the states of Oregon, Washington, 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 participates in various regulatory matters that affect member interests.

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

4. NWIGU regularly participates in rate design or tariff proceedings affecting its members' interests involving local distribution companies in the State of Washington, including proceedings involving Washington Natural Gas Company (WNG).

5. Several NWIGU member companies purchase natural gas services from WNG under various rate schedules, including sales and transportation service. On or about July 27, 1992, WNG filed its application for a general rate increase of \$41,421,000. With this filing, WNG proposes changes to its rates, terms and conditions of service and its customer billing. On August 19, 1992, the

Commission suspended the tariff revisions. Since members of NWIGU acquire services from WNG, they are directly and immediately affected by the outcome of the proceeding. No other party purports to represent the interests of the NWIGU.

6. NWIGU reserves the right to address all issues that affect an industrial customer of WNG under the proposed tariff revisions.

7. 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 this proceeding.

8. Based on the foregoing, the NWIGU seek approval of this Petition to Intervene as a party in this proceeding, with all the procedural and substantive rights associated with party status.

DATED the 24th day of August, 1992.

Respectfully submitted,



Edward A. Finklea
Paula E. Pyron
Counsel for the Northwest
Industrial Gas Users
Heller, Ehrman,
White & McAuliffe
3400 First Interstate Bank Tower
1300 SW 5th
Portland, OR 97201
(503) 227-7400

STATE OF OREGON)
) SS.
COUNTY OF MULTNOMAH)

I, Paula E. Pyron, affirm that this Petition is true and complete to the best of my knowledge and belief.

Paula E. Pyron
Paula E. Pyron
Counsel for Northwest Industrial Gas
Users

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding 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 24th day of August, 1992.

Paula E. Pyron
Paula E. Pyron