GRAHAM & DUNN

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STATE OF THE STATES OF THE COMMISSION

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August 26, 1992

Mr. Paul Curl Secretary Washington Utilities and Transportation Commission P. O. Box 47250 1300 South Evergreen Park Dr. S.W. Olympia, WA 98504-7250

Re: Docket No. UG-92-0840

Washington Utilities & Transportation Commission v.

Washington Natural Gas Company

Dear Mr. Curl:

Enclosed please find the original plus 19 copies of a Petition for Intervention submitted on behalf of Seattle Steam Company by its undersigned counsel.

Sincerely,

GRAHAM & DUNN

Frederick O. Frederickson

Attorney for Seattle Steam Company

FOF:rel Enclosures J:\C00220\M12067\00006554.REL

BEFORE THE WASHINGTON UTILITIES AND TRADE COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

V.

WASHINGTON NATURAL GAS COMPANY,

Respondent.

No. UG-92-0840

PETITION FOR INTERVENTION

Respondent.

Seattle Steam Company ("Seattle Steam") hereby moves to intervene in the above-captioned proceeding pursuant to WAC 480-09-430. In support of its petition, Seattle Steam states as follows:

- 1. Seattle Steam purchases a substantial amount of natural gas from Washington Natural Gas Company under various tariff rates. The proposed changes to the tariff rates in this general rate case substantially impact Seattle Steam's business.
- 2. At this time, Seattle Steam does not seek to modify or expand the issues before the Commission in this proceeding. Seattle Steam is not represented by any other party in this proceeding and intervention is necessary in order to adequately protect Seattle Steam's interests.

GRAHAM & DUNN

33rd Floor 1420 Fifth Avenue Seattle, Washington 98101-2390 (208) 824-8300 Fax: (208) 340-9599

2.2.

1	3. Seattle Steam's business address is:					
2	Seattle Steam Company c/o Mr. James G. Young					
3	1325 Fourth Avenue Suite 1440					
4	Seattle, Washington 98101.					
5	4. The name and address of Seattle Steam's attorney in this					
6	proceeding is:					
7	Frederick O. Frederickson Suite 3300					
8	1420 Fifth Avenue Seattle, Washington 98101					
9	Telephone: (206) 624-8300.					
10	5. Seattle Steam reserves its right at this time to submit					
11	written testimony and exhibits, call witnesses, cross examine					
12	witnesses called by other parties and submit written arguments					
13	and/or motions.					
14	WHEREFORE, Seattle Steam respectfully petitions the Commission					
15	for leave to intervene in this proceeding, and the right to					
16	participate in any hearings therein.					
17	GRAHAM & DUNN					
18	BY: Tresund Trouveclor					
19	Frederick O Frederickson WSBA #1856					
20	STATE OF WASHINGTON)					
21) SS. COUNTY OF KING)					
22	I, Frederick O. Frederickson, being first duly sworn on oath, depose and say:					
23	I am the attorney for Seattle Steam Company, Intervenor					
24	herein. I have read the foregoing Petition for Intervention and I					

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1	hereby verify that the facts set forth therein are true to the best of my knowledge.
2	DATED this 18th day of August, 1992.
3	
4	FREDERICK O. FREDERICKSON
5	SUBSCRIBED AND SWORN to before me this // day of August,
6	1992. Witness my hand and official seal.
7	
8	NOTARY PUBLIC in and for the
9	State of Washington residing at
10	My Commission Expires: 7/5/95.
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	CERTIFICATE OF SERVICE
	I hereby certify that I served the foregoing Petition for
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Intervention on August 26, 1992, by mailing a copy thereof, postage
	prepaid, first class mail at Seattle, Washington, to all parties
	listed below who are on the official service list in Docket
	No. UG-92-0840:
	Charles F. Adams Assistant Attorney General Public Counsel Section 2000 Bank of California 900 Fourth Avenue Seattle, WA 98164-1012 Mary Ann Hutton Executive Director Northwest Industrial Gas Users 9999 N.E. Worden Hill Road Dundee, OR 97115-9147
	Jeffrey D. Goltz Steven Secrist, Esq. Assistant Attorney General Washington Natural Gas Co.

Jeffrey D. Goltz Assistant Attorney General M/S FY-11 1400 S. Evergreen Pk. Dr. S.W. Olympia, WA 98504

Robert Cedarbaum
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Transportation Commission
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Richard E. Tyler Director, Energy Management Weyerhaeuser Company CH 1M31

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Susan K. Schruers General Counsel Tacoma School Dist. #10 P. O. Box 1357 Tacoma, WA 98401-1357

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Rebecca E. Logan

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