

ATTORNEYS AT LAW

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Telephone: (206) 623-7580 Facsimile: (206) 623-7022

September 16, 1992

Mr. Paul Curl Secretary Washington Utilities & Transportation Commission P. O. Box 47250 Olympia, WA 98504-7520

> Re: Docket No. UG-920840 WUTC/Washington Natural Gas

Dear Mr. Curl:

Enclosed please find the original plus 19 copies of the Petition for Intervention of the Partnership for Equitable Rates for Commercial Customers in the above-referenced proceeding.

By

Cordially yours,

PRESTON THORGRIMSON SHIDLER GATES & ELLIS

ol S.I

Carol S. Arnold

CSAjaf Enclosure cc: Service List Steering Committee Members ⁵⁵loxw.doc

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	7	BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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	9	WASHINGTON UTILITIES AND) TRANSPORTATION COMMISSION)
	10	Complainant) v. DOCKET NO. UG-920840
	11	j
	12	WASHINGTON NATURAL GAS) COMPANY) PETITION FOR) INTERVENTION
	13	Respondent)
	14	
	15	Pursuant to WAC 480-09-430, the Partnership for
	16	Equitable Rates for Commercial Customers ("Partnership")
	17	hereby petitions for leave to intervene in the above-
	18	captioned proceeding. In support of its petition, the
	19	Partnership states as follows:
	20	1. The following persons should be included on the
	21	official service list in this proceeding, and all
	22	communications concerning this petition should be addressed
	23	to:
	24	Carol S. Arnold
	25	Preston Thorgrimson Shidler Gates & Ellis 5400 Columbia Center
	26	701 Fifth Avenue Seattle, Washington 98104
		PETITION FOR INTERVENTION - 1 5000 COLUMBIA CENTER 55POXS.DOC 701 FIFTH AVENUE SEATTLE, WASHINGTON 98104-7078 TELEPHONE: (206) 623-7580

2. The Partnership includes representatives of school districts, hospitals, and public agencies who are customers of Washington Natural Gas Company ("WNG"). A current list of the members of the partnership is attached as Attachment A to this petition. Additional members may join the Partnership at a later date.

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3. Partnership members purchase natural gas sales and transportation services under WNG's commercial rate schedules, including, but not limited to, Schedules 31, 36, 41, 85, 86, 87 and 57. Some members of the Partnership also use or propose to use substantial quantities of natural gas for vehicular use.

Although the Partnership has not yet had the
opportunity to review WNG's filing in detail, the Partnership
supports generally the following positions on matters in
controversy:

(1) Commercial customers should pay their fair share of WNG's cost of service and no more.

(2) Transportation services should be available to all commercial customers under reasonable terms and conditions.

(3) WNG ratepayers should be responsible to pay only prudently incurred safety and environmental costs.

(4) WNG should charge incentive-based rates for vehicular natural gas. Competition should be encouraged in the vehicular natural gas industry.

5. The Partnership and its members have a substantial interest in the present proceeding, the Partnership does not

PETITION FOR INTERVENTION - 2 55POXS.DOC PRESTON THORGRIMSON SHIDLER GATES & ELLIS 5000 COLUMBIA CENTER 701 FIFTH AVENUE

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1 2 3 4 5 6 7 8 9 10 11 12 13	desire to broaden the issues of the proceeding, and the Partnership desires to appear and participate. WHEREFORE, the Partnership for Equitable Rates for Commercial Customers requests leave to intervene in this proceeding. DATED this $\underline{ Gh }$ day of September, 1992. Respectfully submitted, PRESTON THORGRIMSON SHIDLER GATES & ELLIS By $\underline{CarOL S. A.C.}$ Attorneys for Partnership for Equitable Rates for Commercial Customers
13 14 15	Equitable Rates for Commercial
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	PRESTON THORGRIMSON SHIDLER GATES & ELLI PETITION FOR INTERVENTION – 3 55POXS.DOC PRESTON THORGRIMSON SHIDLER GATES & ELLI 5000 COLUMBIA CENTER 701 FIFTH AVENUE SEATTLE, WASHINGTON 98104-7078

TELEPHONE: (206) 623-7580

CERTIFICATE OF SERVICE

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3	I hereby certify that I served the foregoing Petition to
4	Intervene on September $\frac{16}{16}$ m, 1992, by mailing a copy
5	thereof, postage prepaid, first class mail at Seattle,
6	Washington, to all parties listed on the official service
7	list in Docket No. UG-920840 as follows:
8	Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW
9	P. O. Box 47250 Olympia, WA 98504-7250
10	Orympia, WA 98504-7250
11	Robert D. Cedarbaum Jeffrey D. Goltz
12	Assistant Attorneys General 1400 S. Evergreen Park Drive S.W.
13	Mail Stop FY11 P.O. Box 40128
14	Olympia, WA 98504-0128
15	Charles F. Adams Public Counsel Section
16	Office of Attorney General 2000 Bank of California Center
17	900 Fourth Avenue, TB-14 Seattle, WA 98164-1012
18	D. Scott Johnson
19	Washington Natural Gas Company 815 Mercer Street
20	P.O. Box 1869 Seattle, WA 98111
21	Frederick O. Frederickson
22	Graham & Dunn 1420 Fifth Avenue - 33rd Floor
23	Seattle, WA 98101-2390
24	DATED this 16th day of September, 1992.
25	
26	Carol S. Arnold
	PRESTON THORGRIMSON SHIDLER GATES & ELLIS

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701 FIFTH AVENUE SEATTLE, WASHINGTON 98104-7078 TELEPHONE: (206) 623-7580

PETITION TO INTERVENE (Docket No. UG-920840)

PARTNERSHIP FOR EQUITABLE RATES FOR COMMERCIAL CUSTOMERS

ATTACHMENT A

Cost Management Services, Inc. Evergreen Hospital Medical Center General Hospital Medical Center Highline Community Hospital Interlocal Natural Gas Procurement Cooperative: Bellevue School District No. 405 Clover Park School District No. 400 Fife School District No. 417 Highline School District No. 401 Kent School District No. 415 Lake Washington School District No. 414 Marysville School District No. 25 Northshore School District No. 417 Puyallup School District No. 3 Renton School District No. 403 Seattle School District No. 1 South Central School District No. 406 Sumner School District No. 320 Tacoma School District No. 10 Tahoma School District No. 409 University Place School District No. 83 MultiCare Medical Center Northwest Hospital

Providence Medical Center Seattle Area Hospital Council St. Francis Community Hospital St. Joseph Hospital and Health Care Center Stevens Memorial Hospital Swedish Medical Center - Seattle Valley Medical Center