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Docket No.: UG-920840

Company: Washington Natural Gas

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Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

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August 13, 1993

Paul Curl, Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

RE: WUTC v. Washington Natural Gas Co.
Docket No. UG-920840
Brief of Public Counsel

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Dear Mr. Curl:

In reviewing our brief, I have discovered two sentences where words were accidentally omitted in the typing process, with the result that they are unintelligible. I am therefore providing the corrected text of each sentence with the omitted words underlined.

Page 18, line 16 of text should read:

Thus, for example, Value Line noted WNG's rapid growth, its "vibrant" service territory in spite of Boeing lay-offs, expanding high technology businesses, and reduced capital spending with emphasis on hookups on existing mains (Ex. 294, p.1).

Page 21, line 12 of text should read:

In addition to ignoring the concerns of the Commission and Legislature, WNG clearly has conducted its M & J operations in violation of RCW 80.04.270, which requires that a company engaged in "the sale of merchandise or appliances or equipment" keep its accounts for these operations separate from the revenues, expenses and investment used to provide regulated services.

Finally, in preparing Attachment A, we were not certain what number the Company was proposing as its attrition adjustment. We have included our best estimate but it may be incorrect and the Commission should rely on the Company's representation of its

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adjustment. The Public Counsel position on this adjustment would remain at \$0, regardless of the company number.

Thank you for your assistance.

Sincerely,



CHARLES F. ADAMS
Assistant Attorney General
Public Counsel Section

CFA/ljb
cc: ALJ Lisa Anderl
Parties

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