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PAULA E. PYRON

August 4, 1994

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

Mr. Steve McLellan, Secretary  
Washington Utilities and Transportation Commission  
Chandler Plaza Building  
1300 S. Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: WUTC v. Washington Natural Gas Corporation, Docket No.  
UG-940814, Motion of Intervenors Northwest Industrial Gas  
Users, Inland Pacific Energy Services Corp., and  
Associated Gas Services, Inc. to Eliminate Multiple  
Hearings and Establish Procedural Schedule

Dear Mr. McLellan:

Enclosed for filing please find the original and nineteen  
copies of the Motion of Intervenors Northwest Industrial Gas Users,  
Inland Pacific Energy Services Corp., and Associated Gas Services,  
Inc. to Eliminate Multiple Hearings and Establish Procedural  
Schedule. One additional copy of the pleading is enclosed to be  
file-stamped and returned for our records.

Thank you for your assistance with this matter. If you have  
any questions regarding this filing, please call me.

Very truly yours,



Paula E. Pyron  
Counsel for Northwest Industrial  
Gas Users, Inland Pacific Energy  
Services Corp., and Associated Gas  
Services,

Enclosures

cc w/enc.: All Parties of Record via Federal Express  
ALJ L. Anderl via Federal Express

STATE OF WASH.  
UTILITY & TRANSPORTATION  
COMMISSION  
94 AUG -5 19:44  
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BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	Docket No.	'94 AUG -5 A9:44
Complainant,	)	UG-940814	
	)	MOTION OF INTERVENORS OF WASH.	
vs.	)	NORTHWEST INDUSTRIAL GAS USER	
	)	USERS, INLAND PACIFIC	
	)	ENERGY SERVICES CORP. AND	
WASHINGTON NATURAL GAS COMPANY,	)	ASSOCIATED GAS SERVICES,	
	)	INC. TO ELIMINATE	
	)	MULTIPLE HEARINGS AND	
	)	ESTABLISH PROCEDURAL	
	)	SCHEDULE	
Respondent.	)		

MOTION OF INTERVENORS NORTHWEST INDUSTRIAL GAS USERS, INLAND  
PACIFIC ENERGY SERVICES CORP. AND ASSOCIATED GAS SERVICES, INC.  
TO ELIMINATE MULTIPLE HEARINGS AND ESTABLISH PROCEDURAL SCHEDULE

Recognizing that this case presents primarily policy issues and recognizing the Commission's interest in the use of alternative procedures when more efficient, the Intervenor Northwest Industrial Gas Users, Inland Pacific Energy Services Corp. and Associated Gas Services, Inc. (collectively "NWIGU et al.") request that the Commission or presiding officer order a different procedural approach for this case that will preserve the full procedural rights of all parties under existing Commission rules, but better serve the parties and the Commission. While the parties will likely have differing substantive viewpoints to present to the Commission for resolution in this case, all could benefit from a streamlining of the procedural process and a recognition of consensus when it exists or can be facilitated through settlement discussions.

Accordingly, pursuant to Washington Administrative Code 480-09-420(8), 480-09-460(1), and 480-09-735(2), NWIGU et al. move the Commission or presiding officer to enter an order directing a procedural schedule for the above captioned matter that: (a) eliminates multiple rounds of cross-examination hearings in this docket; (b) allows for the filing of surrebuttal testimony by all intervenors, the Staff and Public Counsel at the time of the filing of the Company's prefiled rebuttal testimony; (c) establishes a settlement/issues conference at least two weeks before the start of any round of hearings, with any stipulations to be filed one week before the start of any hearings for Commission approval; and, (d) allows for oral argument in addition to written briefs by counsel for each party for a maximum of 20 minutes at the close of the hearings on this matter. In support of this Motion, NWIGU et al. show the Commission and presiding officer the following:

1. NWIGU et al. ask the Commission to eliminate the traditional multiple hearings schedule for this case and to instead order that a single hearing be scheduled for cross-examination of the Company's and all parties' prefiled testimony. Alternatively NWIGU et al. ask the Commission to schedule only two rounds of cross-examination hearings (one round on the direct, prefiled testimony of Washington Natural Gas Company ("WNG or Company") and one round on the prefiled testimony of the Staff, Public Counsel, intervenors and Company rebuttal). The use of cross-examination hearings on each round of prefiled

testimony would not be an efficient use of administrative resources for this case. Unlike a "full-blown" general rate case, the development of each party's position here is not dependent upon sequential cross-examination hearings.

2. This case was only filed at the conclusion of an extensive collaborative process in which all likely interests participated. As a result of the collaborative, a single cost-of-service computer model has been agreed to, thereby eliminating many technical issues. Furthermore, there are no revenue requirement issues, as WNG has filed its proposal based on the overall revenue requirement approved in its recently concluded general rate proceeding, Docket No. UG 931405. The issues that lie at the center of this proceeding are much more policy focused and less fact intensive than most general rate cases. Given this background, multiple rounds of hearings do not appear necessary or efficient.

3. After allowing full opportunity for each party to conduct discovery and allowing for the sequential filing of direct testimony and rebuttal/surrebuttal testimony by all parties, a consolidation of the examination of all witnesses on all prefiled testimony appears to be the most efficient course. Alternatively NWIGU et al. suggest the Commission schedule at most two rounds of cross-examination hearings (one on the Company's direct case and the other on the prefiled testimony of the Staff, Public Counsel, intervenors and Company's rebuttal).

4. The schedule as envisioned by NWIGU et al. would still allow for adequate time for all parties to prepare their cases and pursue discovery after the filing of each party's testimony sequentially. NWIGU et al. do not seek to shorten the suspension period for a decision by the Commission and do not seek to limit the time available for discovery by all parties.

5. Given the policy issues inherent in this matter, NWIGU et al. also request that the Commission allow an additional round of prefiled surrebuttal testimony for Staff, Public Counsel and the intervenors to respond to each other at the same time as the pre-filing of the Company's rebuttal. Surrebuttal testimony in this proceeding would bring the issues into better focus and should result in less actual time being spent in cross-examination.

6. NWIGU et al. request that the schedule for this matter include a specific issues/settlement conference(s) in the procedural order two weeks before any hearing with a list of any resulting stipulated issues to be filed jointly by the parties one week before the hearing or hearings begin, with any such stipulation subject to approval by the Commission.

7. NWIGU et al. request that a limited time of 20 minutes for oral argument be scheduled for the counsel for each party at the end of the case at the convenience of the Commission in addition to the filing of written briefing. Oral argument would help the parties focus their issues and facilitate a better policy dialogue between the parties and the Commissioners than

can be accomplished with merely cross-examination and written briefs.

8. These proposed procedural modifications are within the scope of the Commission's existing procedural rules.

WHEREFORE, premises considered, NWIGU et al. move the Commission or presiding officer to issue an order that directs a procedural schedule with a single round of cross-examination on all parties' prefiled testimony, that allows the filing of surrebuttal prefiled testimony by any intervenor, the Staff or Public Counsel in order for those parties to respond to each other's respective positions in this case at the time of the filing of the Company's prefiled rebuttal testimony, that schedules a settlement/issues conference at least two weeks before any cross-examination hearing with the filing of any stipulated issues to be submitted by the parties for Commission approval at least one week before the hearing is scheduled to commence, and allows 20 minutes of oral argument by counsel for

each party at the close of the hearings in addition to the submission of written briefs.

DATED the 4th day of August, 1994.

Respectfully submitted,

Paula E. Pyron

Edward A. Finklea  
Paula E. Pyron  
Counsel for the Northwest  
Industrial Gas Users,  
Inland Pacific Energy  
Services Corp., and  
Associated Gas Services, Inc.  
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(503) 295-1058 Fax

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 via overnight delivery service.

Dated at Portland, Oregon, this 4th day of August, 1994.

Paula E. Pyron  
Paula E. Pyron



Stevens Memorial Hospital  
Sumner School District No. 320  
Swedish Medical Center - Seattle  
Tacoma School District No. 10  
Tahoma School District No. 409  
University Place School District No. 83  
Valley Medical Center

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