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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

The PUBLIC COUNSEL Section of the Office of
the Washington Attorney General,

Complainant,

v.

CASCADE NATURAL GAS CORP.;
PACIFICORP dba PACIFIC POWER &
LIGHT CO.,

Respondents.

DOCKET NO. U-030744

PETITION FOR LIMITED
INTERVENTION OF VERIZON
NORTHWEST INC.

Pursuant to WAC 480-09-430, Verizon Northwest Inc. ("Verizon") hereby petitions the Washington Utilities and Transportation Commission ("Commission") for leave to intervene in the above-entitled docket on a limited basis. As grounds for this intervention, Verizon states as follows:

I. CONTACT INFORMATION

All communications with Verizon should be directed to the following persons:

Judith A. Endejan
Graham & Dunn PC
Pier 70
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Seattle, WA 98121-1128
Voice: (206) 340-9694
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PETITION FOR LIMITED
INTERVENTION OF VERIZON
NORTHWEST INC. -- 1

GRAHAM & DUNN PC
Pier 70 ~ 2801 Alaskan Way ~ Suite 300
Seattle, Washington 98121-1128
(206) 624-8300/Fax: (206) 340-9599

II. BACKGROUND INFORMATION

Verizon provides telecommunications services to customers throughout Washington, including within the boundaries of several Indian reservations. It was involved in a case before the Commission that involved the issue of whether Verizon could pass-through a tribal utility tax imposed by the Swinomish Indian Tribe to all customers residing within the boundaries of the Swinomish Indian Reservation. See *Brannon & Terry McNeil v. Verizon Northwest Inc.*, (Docket No. UT-010966). On January 14, 2002, the Commission issued an Order Granting Motion for Summary Determination affirming Verizon's pass-through of this tribal utility tax.

Verizon understands that the issue of a public utility's authority to pass-through tribal utility tax is again before the Commission in this docket. It seeks authority to intervene on a limited basis for two reasons. First, Verizon wishes to receive all notices and pleadings filed by the parties in this case. Second, Verizon wishes to reserve the right to file a brief on the central issue in this case in support of the Cascade's authority to pass-through a tribal utility tax.

Verizon only recently learned that a prehearing conference had been set for August 11, 2003, and would have petitioned orally at this conference, but the undersigned counsel has an unavoidable conflict. Therefore, Verizon respectfully requests the Commission to accept this written petition in lieu of an oral petition to intervene.

III. SCOPE OF PARTICIPATION

Verizon's intervention will not broaden the issues to be addressed, burden the record or delay the proceedings. As noted above, Verizon is interested in preserving its authority to pass-through tribal utility taxes as clarified in Docket No. UT-010966, *Brannon & Terry McNeil v. Verizon Northwest Inc.*

IV. RELIEF REQUESTED

WHEREFORE, Verizon respectfully requests leave to intervene on a limited basis as a party to this proceeding, to have notice of and appear at the taking of testimony, and to be heard in person or by counsel on brief and at oral argument.

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RESPECTFULLY SUBMITTED this 11th day of August 2003.

GRAHAM & DUNN PC


By Michael Atkins #26026 for:
Judith A. Endejan
WSBA# 11016
Email: jendejan@grahamdunn.com
Attorneys for Verizon Northwest Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this Petition for Limited Intervention of Verizon Northwest Inc. upon all parties of record of this proceeding via facsimile.

DATED at Seattle, Washington this 11th day of August 2003.


Nancy E. Dickerson