

PRESTON GATES & ELLIS

August 1, 1994

Steve McLellan
Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re:

Docket No. UG-940814

Washington Natural Gas

Dear Mr. McLellan:

Enclosed for filing are the original and 19 copies of PERCC's Petition for Intervention in the above-referenced docket. Please return a file-stamped copy of the Petition to us in the enclosed envelope. Thank you for your attention to this matter.

Very truly yours,

PRESTON GATES & ELLIS

By

Carol S. Arnold

CSA:jal

cc:

Enclosure

Service List

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5	BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
6	WASHINGTON UTILITIES AND)
7	TRANSPORTATION COMMISSION)
8	Complainant)
9	v.) DOCKET NO. UG-940814)
10	WASHINGTON NATURAL GAS) COMPANY) PETITION FOR INTERVENTION
11) Respondent)
12)
13	
14	Pursuant to WAC 480-09-430, the Partnership for Equitable Rates for Commercial
15	Customers ("PERCC") hereby petitions for leave to intervene in the above-captioned proceeding.
16	In support of its petition, PERCC states as follows:
17	1. The following persons should be included on the official service list in this
18	proceeding, and all communications concerning this petition should be addressed to
19	Carol S. Arnold Preston Gates & Ellis
20	5000 Columbia Center
21	701 Fifth Avenue Seattle, WA 98104-7078
22	(206) 623-7580
23	2. PERCC is an organization comprised of school districts, hospitals, and public
24	agencies who are customers of Washington Natural Gas Company ("WNG"). A list of PERCC
25	members is attached as Exhibit A.
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- 3. PERCC 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 PERCC members also use substantial quantities of natural gas for vehicular use.
- 4. Although PERCC has not yet had the opportunity to review WNG's filing in detail, PERCC 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 should charge incentive-based rates for vehicular natural gas. Competition should be encouraged in the vehicular natural gas industry.
- 5. PERCC and its members have a substantial interest in the present proceeding, PERCC does not desire to broaden the issues of the proceeding, and PERCC desires to participate in this proceeding.

WHEREFORE, the Partnership for Equitable Rates for Commercial Customers requests leave to intervene in this proceeding.

DATED this 1st day of August, 1994.

PRESTON GATES & ELLIS

Carol S. Arnold wsba#18474

Knoll D. Lowney wsba#23457

Attorneys for Intervenor

Partnership for Equitable Rates for Commercial

Customers (PERCC)

CERTIFICATE OF SERVICE

Attorney for Intervenor PERCC

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3	I hereby certify that I have this day served the foregoing Petition to Intervene, by depositing a copy of same in the United States mail at Seattle, Washington, postage prepaid, to all parties in Docket No. LIG 040814 as follows:
4	parties in Docket No. UG-940814 as follows:
5	D. Scott Johnson Washington Natural Gas Company
6	815 Mercer Street. P. O. Box 1869 Seattle, WA 98109
7	Donald T. Trotter
8	Assistant Attorney General
9	Public Counsel Section 900 Fourth Avenue, Suite 2000
10	Seattle, WA 98164
11	Robert D. Cedarbaum
12	Anne E. Egeler Assistant Attorney General
13	1400 S. Evergreen Park Drive S.W., MS FY-11 P. O. Box 40128
14	Olympia, WA 98504-0128
15	Frederick O. Frederickson
16	Graham & Dunn 1420 Fifth Avenue, 33rd Floor
17	Seattle, WA 98101-2390
18	Edward A. Finklea
19	Paula Pyron Ball, Janik & Novack
20	101 S. W. Main Street, Suite 1100 Portland, OR 97204
21	Totalia, Ok 37201
22	DATED at Seattle, Washington this day of August, 1994.
23	7-112
24	Carol S. Arnold

PETITION FOR INTERVENTION - 3

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PETITION TO INTERVENE (Docket No. UG-940814)

PARTNERSHIP FOR EQUITABLE RATES FOR COMMERCIAL CUSTOMERS

EXHIBIT A

Bellevue School District No. 405

Clover Park School District No. 400

Evergreen Hospital Medical Center

Fife School District No. 417

General Hospital Medical Center

Highline Community Hospital

Highline School District No. 401

Kent School District No. 415

Lake Washington School District No. 414

Marysville School District No. 25

MultiCare Medical Center

Northshore School District No. 417

Northwest Hospital

Pierce Transit

Providence Medical Center

Puyallup School District No. 3

Renton School District No. 403

Seattle Area Hospital Council

Seattle School District No. 1

South Central School District No. 406

St. Francis Community Hospital

St. Joseph Hospital and Health Care Center