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EDWARD A. FINKLEA

July 28, 1994

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, Petition to Intervene of Associated Gas
Services, Inc.

Dear Mr. McLellan:

Enclosed for filing please find the original and nineteen
copies of the Petition to Intervene of Associated Gas Services,
Inc. in the above referenced proceeding. 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,

Edward A Finklea

Edward A. Finklea
Counsel for Associated Gas
Services, Inc.

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Enclosures

cc w/enc.: All Parties of Record
S. Lavigne

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STATE OF WASH.
UTIL. & TRN. COM.
COMMISSIONER

Edward A. Finklea
Paula E. Pyron
Ball, Janik & Novack
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Portland, OR 97204-3274
(503) 228-2525
(503) 295-1058 Fax
Counsel for Associated Gas Services, Inc.

3. Associated Gas is a natural gas producer and marketer, and sells gas and marketing services to end users and local distribution companies in Oregon, Washington, and Idaho. Associated Gas's clients include end users on Washington Natural Gas Company's (WNG's) local distribution system.

4. On or about June 15, 1994, WNG filed a rate redesign proposal for transportation service along with a supporting cost-of-service study, which was submitted in compliance with the WUTC's Orders in Docket No. UG-920840. With this filing, WNG proposes changes to its rates, as well as the terms and conditions of transportation service. On July 13, 1994, the Commission suspended the tariff revisions.

5. Since numerous clients of Associated Gas acquire services from WNG, they and Associated Gas are directly and immediately affected by the outcome of this proceeding. The terms and rates governing transportation service on WNG directly impact the services and contractual relationships that Associated Gas has with its current and prospective customers. No other party purports to represent the interests of Associated Gas.

6. Associated Gas does not desire to broaden the issues of the proceeding, but does reserve the right to address any and all

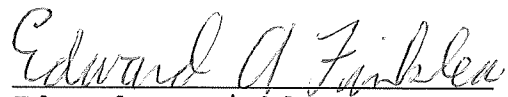
issues that affect a marketer and its customers under the proposed tariff revisions. These issues would include, but not be limited to, the appropriate cost-of-service methodology for a gas local distribution company supplying transportation service and the appropriate rate design and operating provisions for industrial sales and transportation services offered by WNG.

7. Associated Gas reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in this proceeding.

8. Based on the foregoing, Associated Gas seeks approval of this Petition to Intervene as a party in this proceeding, with all the procedural and substantive rights associated with party status.

DATED the 28th day of July, 1994.

Respectfully submitted,



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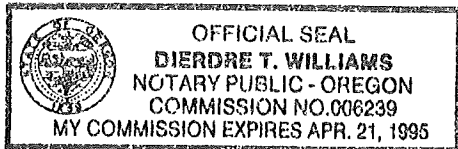
STATE OF OREGON)
) SS.
COUNTY OF MULTNOMAH)

I, Edward A. Finklea, counsel for Associated Gas Services, Inc. affirm that this Petition is true and complete to the best of my knowledge and belief.

DATED this 28th day of July, 1994.

Edward A. Finklea
Edward A. Finklea
Counsel for Associated Gas
Services, Inc.

Sworn and subscribed to before me this 28th day of July, 1994.



Dierdre T. Williams
Notary Public for the State of Oregon

My Commission Expires: 4/21/95

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 in the United States mail first class postage prepaid.

Dated at Portland, Oregon, this 28th day of July, 1994.

Edward A. Finklea
Edward A. Finklea