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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 Inland Pacific Energy Services Corporation

Dear Mr. McLellan:

Enclosed for filing please find the original and nineteen copies of the Petition to Intervene of Inland Pacific Energy Services Corporation 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

Counsel for Inland Pacific Energy Service Corporation

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Enclosures

cc w/enc.: All Parties of Record

G. Stauffer

STATE OF MASH.

STATE OF MASH.

STATE OF MASH.

BEFORE THE WASHINGTON UTILITIES AND

TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)) Docket No.		P
Complainant,) UG-940814)		' 94	Ŋ
V.) PETITION TOGETHER) INTERVENE	哥	
WASHINGTON NATURAL GAS COMPANY,		1	e L ^{egist} e Hanna
Respondent.		Si	in C

PETITION TO INTERVENE OF INLAND PACIFIC ENERGY SERVICES CORPORATION

Pursuant to Washington Administrative Code 480-09-430(1), Inland Pacific Energy Services Corporation (IPE) hereby petitions the Washington Utilities and Transportation Commission (WUTC) for leave to intervene in the above-captioned proceeding. In support of this Petition, IPE states as follows:

1. The following person should be included on the official list of parties of record in this proceeding, and all correspondence and communications concerning this proceeding should be addressed to:

Gary Stauffer
Inland Pacific Energy Services Corp.
1124 W. Riverside, Suite 400
Spokane, Washington 99201
(509) 459-1363
Fax: (509) 1358

2. The following attorneys should be included on the official list of parties of record in this proceeding, and all correspondence and communications concerning this proceeding should be addressed to:

PAGE 1 - INLAND PACIFIC ENERGY SERVICES PETITION TO INTERVENE

Edward A. Finklea
Paula E. Pyron
Ball, Janik & Novack
101 S.W. Main Street
Suite 1100
Portland, OR 97204-3274
(503) 228-2525
(503) 295-1058 Fax
Counsel for Inland Pacific Energy Services Corp.

- 3. IPE is a company primarily engaged in marketing natural gas and managing the gas transportation needs of industrial, institutional and utility customers in the Pacific Northwest.

 IPE's clients include end users on Washington Natural Gas

 Company's (WNG's) local distribution system, in addition to its clients behind other gas local distribution companies in Washington.
- 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. Because IPE has several clients that acquire services from WNG, these clients and IPE 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 IPE has with its current and prospective customers. No other party purports to represent the interests of IPE.

PAGE 2 - INLAND PACIFIC ENERGY SERVICES PETITION TO INTERVENE

- 6. IPE 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. IPE 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, IPE 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,

Edward A. Finklea

Paula E. Pyron

Counsel for Inland Pacific Energy Services Corp.

Ball, Janik & Novack 101 S.W. Main Street

Suite 1100

Portland, OR 97204-3274

(503) 228-2525

(503) 295-1058 Fax

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STATE (OF (OREGON)	
)	SS.
COUNTY	OF	MULTNOMAH)	

I, Edward A. Finklea, counsel for Inland Pacific Energy Services Corp., 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

Counsel for Inland Pacific Energy Services Corp.

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

1334	
A PARA	OFFICIAL SEAL
A SHOW O	DIERDRE T. WILLIAMS
	NOTARY PUBLIC - OREGON
THE STATE OF THE S	COMMISSION NO.006239
MY CON	MMISSION EXPIRES APR. 21, 1995

Miller D Williams
Notary Public for the State of Oregon

My Commission Expires: 4/31/95

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