

David S. Johnson Attorney

July 28, 1994

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

> Re: Docket Nos. UG-940034/UG-940814 Motion to Consolidate

Dear Mr. McLellan:

Enclosed please find the original and nineteen copies of the Company's Motion to Consolidate Docket No. UG-940034 and Docket No. UG-940814. Please accept the same for filing.

To facilitate consolidation of the dockets, the Company waives the suspension date in Docket No. UG-940034 and consents to an extension of said date to coincide with the suspension date in Docket No. UG-940814.

Very Truly Yours,

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David S. Johnson

Enc. cc w/ enclosures:

Counsel of Record Ronald Amen

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5	BEFORE THE WASHINGTON UTILITIES	S AND TRANSPORTATION COMMISSION
6	WASHINGTON UTILITIES AND	
7	TRANSPORTATION COMMISSION,)	DOCKET NOS. UG-940034/
8	Complainant,)	UG-940814
9	v.)	MOTION BY RESPONDENT
10) WASHINGTON NATURAL	WASHINGTON NATURAL GAS COMPANY TO CONSOLIDATE
11	GAS COMPANY,	DOCKETS
12	Respondent.)	
13	,	

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Respondent Washington Natural Gas Company ("the Company") moves for an order consolidating Docket No. UG-940034 and Docket No. UG-940814 for all future proceedings, including hearing and final disposition.

Respondent's name is Washington Natural Gas Company.
Respondent's address is 815 Mercer Street, Seattle, Washington 98109.

2. On January 7, 1994, the Company filed in Docket No. UG-940034 an amendment to Rate Schedule 50, relating to sales of compressed natural gas for vehicle fuel.

3. On June 15, 1994, the Company filed in Docket No. UG-

940814 certain tariff provisions which proposed a single rate for distribution transportation service, and which further proposed a reallocation of revenue requirements among all customer classes.

4. The Commission has scheduled prehearing conferences to occur in the respective dockets. Both conferences are scheduled for August 10, 1994.

5. Schedule 50 is one of the rate schedules for which the Company has proposed to revise in Docket No. UG-940814, based on the cost-of-service study which the Company has submitted. There is thus a common connection and question of fact between Docket No. UG-940034 and Docket No. UG-940814.

6. Consolidation of the two dockets will promote administrative efficiency, by avoiding the need to hold duplicate prehearing conferences and hearings. If consolidation occurs, the Company's proposed tariff revisions will all be heard in a single proceeding, rather than in separate proceedings. The review of Schedule 50 can then occur in conjunction with the review of the Company's other rate schedules and the revisions which the Company has proposed.

Requested Relief

1. For the above reasons, the Company moves the Commission

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for an order consolidating Docket No. UG-940034 and Docket No. UG-940814 for all future proceedings, including hearing and final disposition.

Dated: <u>7-28-94</u>

Washington Natural Gas Company

By: M = M

David S. Johnson Attorney

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	4	BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION		
	5	WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,		
	7	Complainant,		
	8	V.)) DOCKET NOS. UG-940034/) UG-940814	
	9	WASHINGTON NATURAL		
	10	GAS COMPANY,		
	11	Respondent.		
	12	CERTIFICATE OF SERVICE		
	13	I hereby certify that on July 29, 1994 the Motion to Consolidate Dockets was served upon all parties on record in the		
	14 15			
	16	Ms. Carol S. Arnold		
	17	Preston Law Firm 5400 Columbia Center		
	18	701 Fifth Avenue Seattle, WA 98104		
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	20	Mr. Robert D. Cedarbaum Assistant Attorney General		
	21	State of Washington Post Office Box 40128		
	22	Olympia, Washington 98504-01	28	
	23	Ms. Anne Egeler Assistant Attorney General		
	24	State of Washington Post Office Box 40128		
	25	Olympia, WA 98504-0128		
	26	Ms. Paula E. Pyron Ball, Janik & Novack		
	27	101 SW Main Street, Suite 11 Portland, Oregon 97204	00	
	28			

Mr. Donald T. Trotter Assistant Attorney General Public Counsel Section 900 4th Avenue Suite 2000 Seattle, Washington 98104-1012 Mr. Fred Fredrickson Graham & Dunn 1420 Fifth Avenue, 33rd Floor Seattle, Washington 98101-2390 David S. Johnson DAVID S. JOHNSON 815 MERCER STREET (P.O. BOX 1869) SEATTLE, WASHINGTON 98111 TELEPHONE: (206) 622-6767