

GRAHAM & DUNN

A PROFESSIONAL SERVICE CORPORATION

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STATE OF WASH.
UTIL. & TRANSP
COMMISSION

July 26, 1994

Mr. Steve McLellan, Secretary
Washington Utilities and Transportation Commission
Post office Box 47250
Olympia, Washington 98504-7250

Re: WUTC v. Washington Natural Gas Corporation, Docket No. UG-940814, Petition for Intervention of Seattle Steam Company

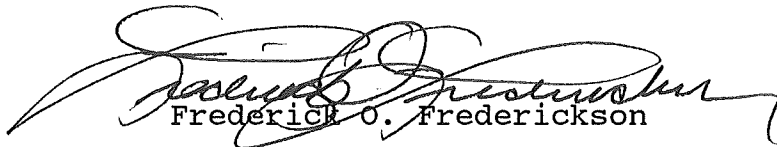
Dear Mr. McLellan:

Enclosed for filing please find the original and nineteen copies of the Petition to Intervene of Seattle Steam Company in the above-referenced proceeding. One additional copy of the pleading is enclosed to be file-stamped and returned for our records in the postage-paid envelope provided.

Thank you for your assistance in this matter. If you have any questions or comments regarding this filing, please contact me.

Sincerely,

GRAHAM & DUNN



Frederick O. Frederickson

FOF:jlc
Enclosures
cc w/encl:

All Parties of Record
Mr. Robert B. Sheppard
Mr. James G. Young

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STATE OF WASH.
UTIL. & TRANSP
COMMISSION

BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UG-940814
)	
v.)	PETITION FOR INTERVENTION
)	
Complainant,)	
)	
WASHINGTON NATURAL GAS COMPANY,)	
)	
Respondent.)	

Seattle Steam Company ("Seattle Steam") hereby petitions to intervene in the above-captioned proceeding pursuant to WAC 480-09-430. In support of its petition, Seattle Steam states as follows:

1. 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. The filing is based on the 9.15% overall rate of return granted by the Commission in Docket No. UG-920840 and the revenue requirement adopted by the Commission in Docket No. UG-931405/UG-931442. On July 13, 1994, the Commission suspended the tariff revisions.

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2. Seattle Steam purchases a substantial amount of natural gas services including transportation services from Washington Natural Gas Company under one or more applicable Schedules and therefore Seattle Steam would be directly and immediately affected by the outcome of this proceeding. Although Seattle Steam has not yet had the opportunity to review WNG's filing in detail, it is Seattle Steam's general position that any applicable rates or charges should be fair, reasonable and sufficient.

3. At this time, Seattle Steam does not seek to modify or expand the issues before the Commission in this proceeding. Seattle Steam reserves the right to address any and all issues that affect an industrial customer of WNG 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. Seattle Steam is not represented by any other party in this proceeding and intervention is necessary in order to adequately protect Seattle Steam's interests.

4. Seattle Steam's business address is:

Seattle Steam Company
c/o Mr. James G. Young
1325 Fourth Avenue, Suite 1440
Seattle, Washington 98101

5. The name and address of Seattle Steam's attorney in this proceeding is:

Frederick O. Frederickson
Graham & Dunn
1420 Fifth Avenue, Suite 3300
Seattle, Washington 98101-2390


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6. Seattle Steam 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.

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WHEREFORE, Seattle Steam respectfully petitions the Commission for leave to intervene in this proceeding, and the right to participate in any hearings therein.

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DATED: July 26, 1994.

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Respectfully Submitted,


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GRAHAM & DUNN

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By 
Frederick O. Frederickson
WSBA # 1856
Attorneys for
Seattle Steam Company

15 STATE OF WASHINGTON)
16) ss.
17 COUNTY OF K I N G)

18 I, Frederick O. Frederickson, being first duly sworn on oath, depose and say:

19 I am the attorney for Seattle Steam Company, Intervenor herein. I have read the foregoing Petition for Intervention and I hereby verify that the facts set forth therein are true to the best of my knowledge.

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Frederick O. Frederickson

SUBSCRIBED AND SWORN to before me this 26th day of July, 1994.

Witness my hand and official seal:

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Adeline S. Blue
Printed Name ADDEL S. BLUE
NOTARY PUBLIC in and for the
State of Washington residing at
Bellevue
My commission expires: 4/1/96

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 1994 the foregoing Petition for Intervention was served upon all parties of record in this proceeding by placing a copy thereof, postage prepaid, in the United States mail, addressed as follows:

Ms. Carol S. Arnold
Preston Law Firm
5400 Columbia Center
701 Fifth Avenue
Seattle, WA 98104

Mr. Robert D. Cedarbaum
Assistant Attorney General
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Mr. David S. Johnson
Washington Natural Gas Company
Post Office Box 1869
Seattle, Washington 98111

Ms. Paula E. Pyron
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