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PAULA E. PYRON

July 14, 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 the Northwest  
Industrial Gas Users

Dear Mr. McLellan:

Enclosed for filing please find the original and nineteen  
copies of the Petition to Intervene of the Northwest Industrial Gas  
Users 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,

*Paula E. Pyron*

Paula E. Pyron  
Counsel for the Northwest  
Industrial Gas Users

Enclosures  
cc w/enc.: All Parties of Record  
M.A. Hutton

STATE OF WASH  
UTIL & TRANSP  
COMMISSION

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BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

|                                 |   |             |
|---------------------------------|---|-------------|
| WASHINGTON UTILITIES AND        | ) |             |
| TRANSPORTATION COMMISSION,      | ) | Docket No.  |
|                                 | ) | UG-940814   |
| Complainant,                    | ) |             |
|                                 | ) | PETITION TO |
| v.                              | ) | INTERVENE   |
|                                 | ) |             |
| WASHINGTON NATURAL GAS COMPANY, | ) |             |
|                                 | ) |             |
| Respondent.                     | ) |             |

PETITION TO INTERVENE OF NORTHWEST INDUSTRIAL GAS USERS

Pursuant to Washington Administrative Code 480-09-430(a), the Northwest Industrial Gas Users (NWIGU) hereby petition the Washington Utilities and Transportation Commission (WUTC) for leave to intervene in the above-captioned proceeding. In support of this Petition, NWIGU 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:

Mary Ann Hutton  
Executive Director  
Northwest Industrial Gas Users  
9999 NE Worden Hill Rd.  
Dundee, OR 97115-9147  
(503) 538-0600  
(503) 538-0603 Fax

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STATE OF WASH  
UTIL & TRANSP  
COMMISSION

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:

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 NWIGU

3. The NWIGU is a nonprofit association comprised of 39 industrial end users of natural gas with major facilities in the states of Washington, Oregon and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, aluminum, steel, chemicals, electronics, and aerospace. The association provides an information service to its members and participates in various regulatory matters that affect member interests.

Counsel for NWIGU is authorized to intervene on behalf of NWIGU in this proceeding by NWIGU and its Executive Director.

4. NWIGU regularly participates in rate and tariff proceedings of local distribution companies in the State of Washington that affect its members' interests, including proceedings involving Washington Natural Gas Company (WNG).

5. Several NWIGU member companies purchase natural gas services from WNG under various rate schedules, including transportation service. 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. Since members of NWIGU acquire services from WNG, they are directly and immediately affected by the outcome of the proceeding. No other party purports to represent the interests of the NWIGU.


6. NWIGU 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.

7. NWIGU 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, the NWIGU seek 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 14th day of July, 1994.

Respectfully submitted,

  
Edward A. Finklea  
Paula E. Pyron  
Counsel for the Northwest  
Industrial Gas Users  
Ball, Janik & Novack  
101 S.W. Main Street  
Suite 1100  
Portland, OR 97204-3274  
(503) 228-2525  
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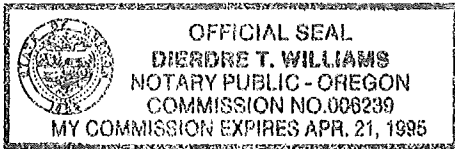
STATE OF OREGON            )  
  )  SS.  
COUNTY OF MULTNOMAH )

I, Paula E. Pyron, counsel for the Northwest Industrial Gas Users, affirm that this Petition is true and complete to the best of my knowledge and belief.

DATED this 14th day of July, 1994.

Paula E. Pyron  
Paula E. Pyron  
Counsel for Northwest Industrial Gas Users

Sworn and subscribed to before me this 14th day of July, 1994.



Dierdre 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 14th day of July, 1994.

Paula E. Pyron  
Paula E. Pyron