

# Rob McKenna

# ATTORNEY GENERAL OF WASHINGTON

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March 15, 2012

David W. Danner, Executive Director and Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW P.O. Box 47250 Olympia, Washington 98504-7250

RE: WUTC v. Northwest Natural Gas (Encana)

Docket UG-111233

Dear Mr. Danner:

Enclosed for filing in the above-referenced docket are the original and ten (10) copies of the Agreed Request for Extension of Time and Certificate of Service.

Sincerely,

SALLY BROWN

Senior Assistant Attorney General

SGB:klg Enclosures cc: Parties

#### BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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NORTHWEST NATURAL GAS COMPANY,

Respondents.

DOCKET UG-111233

AGREED REQUEST FOR EXTENSION OF TIME

The Staff of the Washington Utilities and Transportation Commission requests that the Commission extend the time for filing Staff answering testimony and exhibits from March 20, 2012, to April 3, 2012. No change in the current hearing date of is requested. The parties have authorized Staff to represent their agreement with this request.

The standard applicable to Staff's request is contained in WAC 480-07-385(2):

The commission will grant a continuance if the requesting party demonstrates good cause for the continuance and the continuance will not prejudice any party or the commission. The commission will grant a timely request to which all parties expressly agree unless it is inconsistent with the public interest or the commission's administrative needs.

Staff and the parties remain optimistic that they will reach a unanimous settlement agreement in this case. The parties anticipate filing testimony, a settlement agreement, and narrative in support thereof on April 3, 2012. Good cause, therefore, exists for the Commission to grant the requested extension of time.

Moreover, because no change in the scheduled hearing date is requested, an extension of time to file the testimony, settlement agreement, and narrative in support thereof will not prejudice the Commission. Nor will the requested extension of time be

inconsistent with the public interest or the Commission's administrative needs.

For these reasons, the Agreed Request for Extension of Time should be granted by the Commission.

DATED this 15<sup>th</sup> day of March 2012.

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Respectfully submitted,

ROBERT M. MCKENNA

Attorney General

SALLY BROWN

Senior Assistant Attorney General Counsel for Washington Utilities and Transportation Commission Staff

### Docket UG-111233 CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Agreed Request for Extension of Time upon the persons and entities listed on the Service List below via e-mail and by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 15<sup>th</sup> day of March 2012.

KRISTA L. GRØSS

#### **Confidential Documents:**

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## **Non-Confidential Documents Only:**

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