

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of)	DOCKET NO. UE-031946
)	
PUGET SOUND ENERGY, INC.)	
)	
for Approval of an Amendment to Service)	EXPEDITED MOTION FOR
Quality Index Reporting Methodology:)	CONTINUANCE OF THE
Electric Safety Response Time.)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
_____)	

I. INTRODUCTION

1 Pursuant to WAC § 480-07-385, the Industrial Customers of Northwest Utilities (“ICNU”) respectfully moves the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for a one-week continuance of the deadline for filing comments in this case, currently set for March 29, 2004, to April 5, 2004 (“Motion for Continuance”). Good cause exists to grant this continuance and ICNU is unaware of any prejudice that will occur to any party or the Commission if the Motion for Continuance is granted. Given the limited time available, ICNU also requests expedited review of this request.

II. BACKGROUND

2 On June 20, 2002, the Commission approved a multi-party settlement (“Stipulation”) regarding Puget Sound Energy’s (“PSE”) general rate case.^{1/} The Stipulation set forth the terms for service quality index, including a performance measure

^{1/} Re PSE, Docket Nos. UE-011570, UG-011571, Twelfth Suppl. Order (June 20, 2002).

for electric safety response time. ICNU was not a signator to the Stipulation and was not contacted by PSE to discuss PSE's proposed revisions to the service quality index.

3 On November 25, 2003, PSE filed an application to amend its service quality index reporting methodology regarding electric safety response time ("Application"). PSE requests that the Commission approve its Application, and amend the Stipulation and Twelfth Supplemental Order approving the Stipulation. PSE's amendment will change its existing service practice and may reduce PSE's requirement to provide prompt service restoration.

4 On March 23, 2004, the Commission published a notice of proposed amendment of its prior order and notice of opportunity to file comments. Comments are currently due on March 29, 2004. The Commission's notice provided interested persons with only four business days to review and provide written comments on PSE's Application.

5 ICNU has contacted counsel for the Commission Staff, PSE and Public Counsel and none opposes a brief, one-week extension of time to file comments in this docket.

III. ARGUMENT

6 The Commission's rules provide that "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."^{2/} The continuance requested by ICNU is necessary and appropriate, and good cause exists for the

^{2/} WAC § 480-07-385.

Commission to extend the deadline for filing comments. In addition, neither PSE nor the Commission will suffer any prejudice if the Motion for Continuance is granted.

A. Good Cause Exists to Grant a One-Week Continuance to File Comments

7 ICNU requests a one-week continuance in order to prepare thoughtful and meaningful comments to the Commission. PSE's Application proposes to change its current service restoration requirements in a manner that may harm customers.

8 The current schedule for filing comments does not provide ICNU with sufficient time to adequately review PSE's Application or prepare comments. The Commission only provided interested persons with four business days to prepare comments. Due to the press of business and this extremely short deadline, ICNU will be unable to review PSE's Application, or draft comments that appropriately address the issues raised within. The Commission, all potential parties and the public would be better served if the Commission reviews PSE's Application based on a more complete record.

B. No Party Will Be Prejudiced by a One-Week Extension

9 No prejudice or other harm will occur by a one-week extension in the schedule for filing comments. PSE filed its Application in November 2003, approximately five months prior to the Commission's publication of notice of an opportunity to submit comments. ICNU is unaware of any prejudice or other harm that will befall PSE if the Commission provides the interested public an additional week, or a total of nine business days, to comment on PSE's Application. In contrast, PSE's customers and public generally may experience significant harm if they are not provided sufficient opportunity to comment on PSE's Application.

IV. CONCLUSION

10 For the reasons set forth above, ICNU urges the Commission to grant a
one-week extension in the briefing deadline and allow comments to be filed on April 5,
2004, instead of March 29, 2004.

11 WHEREFORE, ICNU respectfully moves the Commission to grant a one-
week continuance to file written comments in this proceeding.

Dated this 29th day of March, 2004.

Respectfully submitted,

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