BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET UE-072300
TRANSPORTATION COMMISSION,)
) DOCKET UG-072301
Complainant,) (consolidated)
)
v.) JOINT MOTION FOR EXTENSION
) OF TIME FOR FILING CROSS
PUGET SOUND ENERGY, INC.,) ANSWERING AND REBUTTAL
) TESTIMONY
Respondent.)

Pursuant to WAC § 480-07-385, the Industrial Customers of Northwest Utilities ("ICNU"), and the Northwest Industrial Gas Users ("NWIGU") ("Joint Parties") move the

Washington Utilities and Transportation Commission ("WUTC" or the "Commission") to grant a

six day extension of time for all parties to file cross answering testimony and rebuttal testimony

in the above-captioned proceedings. The Joint Parties request that the Commission extend the

due date from June 27, 2008, to July 3, 2008. All other dates in the schedule would remain the

same. Staff, Public Counsel, Puget Sound Energy, Federal Executive Agencies, Seattle Steam

Company, Kroger Company, and Nucor Steel do not oppose this Joint Motion for Extension.

ICNU and NWIGU may need to file cross answering testimony; however,

ICNU's and NWIGU's primary witness will not be available until June 25, 2008. At the time the

schedule was set, ICNU and NWIGU did not anticipate that they would need to file cross

answering testimony. Two days is insufficient time to properly compile cross answering and

rebuttal testimony. In addition, the parties are currently in settlement discussions, which if

successful, could eliminate the need for parties to file cross answering testimony.

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WAC § 480-07-385(2) provides 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." Good cause exists to grant this Joint Motion for

Extension because ICNU and NWIGU do not have adequate time to prepare cross answering

testimony, given the availability of their witness, and settlement discussions may eliminate the

need for cross answering testimony.

ICNU provided a draft of this motion to all the parties and no party opposed it.

Therefore, no party's interest in this case will be prejudiced by an extension. Also, the requested

extension should have no effect on the hearing, which is scheduled to begin August 25, 2008.

WHEREFORE, the Joint Parties respectfully request that the Commission grant

this Joint Motion for Extension.

Dated in Portland, Oregon, this 18th day of June, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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