

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

PACIFIC POWER & LIGHT COMPANY

2022 Power Cost Adjustment Mechanism
Annual Report.

DOCKET UE-230482

STAFF'S MOTION FOR
CONTINUANCE EXTENDING
REVIEW PERIOD OF COMPANY'S
FILING

I. INTRODUCTION

1 Pursuant to WAC 480-07-385, Commission Staff (Staff) of the Washington Utilities and Transportation Commission (Commission) moves for a continuance to postpone the deadline to complete the review of the Pacific Power & Light Company's (the Company) filing requesting extension of the amortization of the PCAM surcharge.

2 Staff seeks this continuance as it is still awaiting outstanding Data Request (DR) responses and requires additional time to complete its review of the Company's filing. Staff's present motion is not intended to subsume, replace, or comment on the Petition for Adjudication filed by AWEC; however, as an order on that Petition remains outstanding, Staff is submitting this request for continuance since the review period granted by the Commission's October 11, 2023 Order has expired. Neither AWEC nor PacifiCorp oppose this motion, with AWEC's position being based on its understanding that this motion is not meant to subsume, replace, or comment on its currently pending Petition for Adjudication. Staff was unable to get an answer from Public Counsel regarding this continuance.

II. RELIEF REQUESTED

3 Staff requests that the Commission continue the date for completing review of the Company's filing from October 31, 2023 to November 20, 2023.

III. STATEMENT OF FACTS

4 The Company filed its Petition to Extend the Amortization of the PCAM Surcharge
(the Petition) on June 15, 2023. The initial deadline was September 15, 2023, 90-days after
the Petition was filed.¹

5 Staff previously requested an extension of this matter via email, and received a one-
week extension. However, given staffing shortages at the Commission, Staff was unable to
complete review of the filing during that time period. On October 6, 2023, Staff submitted a
motion requesting an extension on review to October 31, 2023. On October 10, 2023,
AWEC submitted a Petition for Adjudication of the Company’s 2022 PCAM. On October
11, 2023, the Commission issued an order granting Staff’s motion. AWEC’s Petition for
Adjudication has not been ruled on as of submission of this motion.

IV. STATEMENT OF ISSUES

6 Should the Commission continue the review deadline for the Company’s petition
from October 31, 2023 to November 20, 2023?

V. ARGUMENT

7 The Commission’s administrative rules provide for the “postponement of a deadline
established by commission rule or order,” which the Commission defines as a continuance.²
The Commission will grant a request for a continuance if the requesting party demonstrates
both good cause and that the continuance will not prejudice any other party or the
Commission.³

¹ *Wash. Utils. & Transp. Comm’n v. Pac. Power & Light Co.*, Dockets 140762, 140617 & 131384, Order 09, 7, ¶ 18 (May 26, 2015).

² WAC 480-07-385(1)(a)

³ WAC 480-07-385(2)(a).

8 Good cause exists to continue the deadline for Staff’s review. While Staff timely submitted DRs to the Company to complete evaluation of the PCAM filing, follow-up DRs requesting clarification and more information were necessary. These additional DRs are essential to Staff’s review and its ability to present a complete and thorough analysis to the Commission.

9 The continuance will not prejudice the Company. The extension requested will put the matter on the November 22nd Open Meeting (unless the Petition for Adjudication is granted) resulting in a small delay from the timeline requested in the October 6, 2023 motion for continuance. The extension will provide time for Staff to receive outstanding DRs and requests for clarification. It will also give the Company adequate time to meaningfully respond to those requests, which will allow a more complete record when the matter comes before the Commissioners. The Company does not oppose delaying to the November 22, 2023 open meeting.

10 The Commission will also not be prejudiced by the continuance. The filing contains many complexities that require time to adequately consider. Providing additional time will lead to a more thorough and complete review to be presented to the Commissioners. This will only assist the Commission as Staff can provide a more well-rounded review for the Commissioners to consider.

11 Neither AWEC, intervenor in this matter, nor Public Counsel will be prejudiced as the additional time will provide each the same time as Staff to review, analyze, and assess the Company’s filing. Additionally, this extra time will allow parties to finish responses to AWEC’s Petition for Adjudication without overlapping with the matter prematurely ending up on an Open Meeting. AWEC does not oppose this motion with the understanding this motion does not replace nor comment on its Petition for Adjudication.

VI. CONCLUSION

12 Staff requests that the Commission grant its motion for a continuance and set the deadline for Staff to review the Company's filing to November 20, 2023.

DATED this 2nd day of November 2023.

Respectfully submitted,

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