

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

TREE TOP, INC., a Washington Corporation,

Complainant

v.

CASCADE NATURAL GAS CORPORATION, a Washington Corporation,

Respondent.

DOCKET UG-210745

CASCADE NATURAL GAS CORPORATION'S MOTION FOR EXTENSION OF TIME TO FILE ANSWER

1 Pursuant to WAC 480-07-375(1)(b) and WAC 480-07-370(2)(b), Cascade Natural Gas Corporation (“Cascade”) hereby moves for an order of the Washington Utilities and Transportation Commission (“Commission”) granting a one week extension of time to file its answer to the Complaint filed by Tree Top, Inc. (“Tree Top”) in the above referenced docket.

2 The Complaint was issued on September 27, 2021. As provided by WAC 480-07-370(2)(b), the answer is due twenty days following issuance of the Complaint, or October 18, 2021. WAC 480-07-375(1)(b) further provides that the Commission may alter the time for any answer to be filed. Cascade has conferred with counsel for Tree Top and Staff, and neither party opposes this request.

3 Cascade requests that the Commission consider this request for an extension because Cascade retained counsel in this matter on the afternoon of October 11, 2021. Upon retention, counsel for Cascade immediately began to review the record and the relevant law. However, despite diligent efforts, by October 12, 2021, counsel concluded that it required additional time to complete its review prior to filing responsive pleadings. That same day Cascade’s counsel contacted counsel for Tree Top who advised that Tree Top had no objection to Cascade’s request

for an extension of seven days to file its responsive pleadings in this matter. Cascade's counsel also contacted counsel for Staff, who represented that Staff does not oppose this request for extension. Thereafter, Cascade's Counsel promptly began drafting this motion.

4           The above facts establish good cause for an extension.<sup>1</sup> Counsel has acted diligently. No party will be prejudiced by the extension. And, the Commission and the parties will be well served by allowing adequate time to prepare an answer and any motions directed to the Complaint.

5           For the foregoing reasons, Cascade requests that the Commission grant the requested extension of time and allow Cascade to file its answer and any motions directed to the complaint on October 25, 2021.

DATED: October 13, 2021.

Respectfully Submitted,

MCDOWELL RACKNER GIBSON PC

*/s/ Jocelyn Pease*

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<sup>1</sup> See *In the Matter of Application of Waste Mgt. Wash., Inc. D/B/A WM Healthcare Solutions of Wash. for an Extension of Certificate G-237 for a Certificate of Pub. Convenience and Necessity to Operate Motor Veh. in Furnishing Solid Waste Collection Serv.*, Docket TG-120033, Order 08 ¶¶ 4-5 (Mar. 1, 2013), in which the Commission stated, in dicta that newly associated counsel did not provide good cause to extend a deadline—although the Commission granted the extension nevertheless because of a family medical issue. The Commission's comments regarding new counsel do not apply in this case. In the above order, the party requesting the extension had been represented by counsel throughout the pendency of the case and the deadline for which the party requested an extension was a petition for administrative review of an order issued in the case; moreover in that case the request for extension was opposed.