

## Rob McKenna

# ATTORNEY GENERAL OF WASHINGTON

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April 17, 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 Third 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 THIRD EXTENSION OF TIME

The Staff of the Washington Utilities and Transportation Commission requests that the Commission extend the time for filing a settlement agreement and supporting prefiled testimony from April 17, 2012, to April 24, 2012. The parties have authorized Staff to represent their agreement with this third 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 a settlement agreement and supporting prefiled testimony on April 24, 2012, consistent with WAC 480-07-740(2)(a). Good cause, therefore, exists for the Commission to grant the requested third extension of time.

Moreover, because the hearing on the settlement will be moved to May 29, 2012, an extension of time to file the settlement agreement and supporting prefiled testimony 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 Third Extension of Time should be granted by the Commission.

DATED this 17<sup>th</sup> day of April 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 Third 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 17<sup>th</sup> day of April 2012.

KRISTA L. GROSS

#### **Confidential Documents:**

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

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