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**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Application of  
PUGET SOUND ENERGY**

**Docket UE-200115**

**For an Order Authorizing the Sale of  
All of Puget Sound Energy’s Interests  
in Colstrip Unit 4 and Certain of  
Puget Sound Energy’s Interests in  
the Colstrip Transmission System**

**PUGET SOUND ENERGY’S  
SECOND MOTION FOR  
CONTINUANCE AND TO  
SHORTEN TIME**

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**I. INTRODUCTION**

*I.* Pursuant to WAC 480-07-385, Puget Sound Energy (“PSE”) again asks that the Commission continue the deadline for PSE to file rebuttal testimony and other parties to the proceeding to file cross-answering testimony. Discussions between PSE, NorthWestern Energy and Talen Montana, LLC (“Talen Montana”) regarding whether potential changes to the Proposed Transactions are possible remain ongoing. To allow enough time for PSE, NorthWestern Energy, and Talen Montana to resolve such discussions, good cause exists to continue the rebuttal testimony deadline currently set for October 30, 2020, to November 6, 2020. If granted, PSE does not anticipate the need for another continuance of the deadline for PSE to file rebuttal testimony and other parties to the proceeding to file cross-answering testimony.

1 2. In addition, pursuant to WAC 480-07-110 and WAC 480-07-130(3), PSE  
2 requests that PSE's motion for continuance be heard on shortened time.

3 **II. BACKGROUND AND ARGUMENT**

4 3. On October 19, 2020, on shortened time, PSE filed a motion to continue  
5 the then-existing deadline to file rebuttal testimony and other parties to the  
6 proceeding to file cross-answering testimony until October 30, 2020. PSE filed  
7 the motion to allow PSE, NorthWestern Energy and Talen Montana time for  
8 discussions regarding potential changes to the Proposed Transactions to address  
9 concerns raised by the parties in response testimony and in settlement discussions.

10 4. On October 20, 2020, the Commission granted PSE's motion, continuing  
11 the rebuttal testimony deadline to October 30, 2020. The Commission also set a  
12 status conference for October 29, 2020, and suspended the evidentiary hearing  
13 currently set for November 23, 2020. Additionally, the parties to the proceeding  
14 scheduled a settlement conference for October 29, 2020.

15 5. Good cause exists to again continue the rebuttal testimony deadline. PSE,  
16 NorthWestern Energy and Talen Montana remain engaged in discussions to  
17 address concerns raised by the parties in response testimony and in settlement  
18 discussions. These discussions are ongoing, and PSE believes the outcome of  
19 these discussions could impact the content of any rebuttal testimony that PSE  
20 would file and any cross-answering testimony that other parties may file in this  
21 proceeding, each of which is due on October 30, 2020. PSE believes it would be  
22 highly beneficial to all parties if the deadline for rebuttal and cross-answering  
23 testimony were again extended.

1 6. Given PSE's requested continuance, PSE's proposes that the settlement  
2 and status conferences currently set for October 29, 2020, and the remainder of  
3 the procedure schedule after the proposed rebuttal testimony deadline of  
4 November 6, 2020, be suspended until a status conference is held and a new case  
5 schedule is set. PSE believes the status conference should occur after the rebuttal  
6 testimony deadline. PSE does not object to discovery during this time.

7 7. An extension will not prejudice any party or the Commission. PSE has  
8 conferred with the parties to this proceeding. Each party to this proceeding has  
9 affirmed to PSE that it does not oppose the second continuance and has consented  
10 to PSE making this representation to the Commission. No party opposes this  
11 second continuance. In addition, PSE has proposed, and the parties agree that  
12 another settlement conference would be beneficial where PSE can update the  
13 other parties to the proceeding regarding the outcome of the discussions among  
14 PSE, NorthWestern Energy, Talen Montana, but that such settlement conference  
15 occur after the proposed rebuttal testimony deadline of November 6, 2020.

16 8. In sum, good cause exists to continue the deadline for rebuttal and cross-  
17 answering testimony to November 6, 2020, to allow PSE time to confer with  
18 NorthWestern Energy and Talen Montana regarding whether any changes to the  
19 Proposed Transactions are possible. Such an extension will not harm the parties or  
20 the Commission, but rather will help facilitate a better outcome in this proceeding.

1                                   **III.    MOTION TO SHORTEN TIME PERIOD REQUIRED**  
2                                   **FOR FILING MOTION FOR CONTINUANCE**

3           9.               Under WAC 480-07-385(3), written motions for a continuance are due  
4                           five (5) business days in advance of the deadline the party requests to continue.  
5                           Here, five (5) business days is not possible because rebuttal and cross-answering  
6                           testimony is currently due on October 30, 2020. Accordingly, pursuant to  
7                           WAC 480-07-110(1) and WAC 480-07-130(3), PSE respectfully requests that the  
8                           Commission modify and shorten the time period required for filing a motion for  
9                           continuance. For the reasons set forth above, shortening the time period is in the  
10                          public interest. Moreover, no party will be harmed by the shortened time because  
11                          sufficient time still exists for parties to file a response to PSE’s motion for  
12                          continuance, which each party to the proceeding has indicated that it does not  
13                          oppose.

14                                   **IV.    CONCLUSION**

15           10.               For the reasons set forth above, PSE hereby requests that the Commission  
16                           (i) continue the deadline for the filing of rebuttal and cross-answering testimony  
17                           until November 6, 2020; (ii) suspend the procedural schedule after that date; and  
18                           (iii) order a procedural status conference to occur after the rebuttal testimony  
19                           deadline so a new case schedule can be set. In addition, for the reasons set forth  
20                           above, PSE requests that the Commission grant PSE’s motion to shorten time.

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Dated: October 27, 2020.

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**Respectfully submitted,**



By \_\_\_\_\_

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