BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of) DOCKET NO. UE-051090
MIDAMERICAN ENERGY HOLDINGS)) MOTION FOR EXTENSION OF TIME
COMPANY) OF THE INDUSTRIAL CUSTOMERS
Town Order Authorizing Draws and) OF NORTHWEST UTILITIES
For an Order Authorizing Proposed)
Transaction.)
	_)

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Pursuant to WAC § 480-07-385, the Industrial Customers of Northwest Utilities ("ICNU") moves that the Washington Utilities and Transportation Commission ("WUTC" or the "Commission") grant an extension of time of one week, to November 21, 2005, for Staff, Public Counsel, and intervenors to file Response testimony in the above-captioned proceeding. ICNU does not request that the Commission alter any other dates in the schedule. ICNU would not object, however, to a corresponding one week extension of the November 28, 2005 due date for Rebuttal testimony by PacifiCorp and MidAmerican Energy Holdings Company ("MEHC").

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Good cause exists for the Commission to grant ICNU's request because it is unlikely that ICNU will have its Response testimony and exhibits prepared for filing by the November 14, 2005 due date. ICNU also is a party in the proceeding in which the Public Utility Commission of Oregon ("OPUC") is reviewing MEHC's proposed acquisition of PacifiCorp, and Response testimony regarding MEHC's application in Oregon is due on November 21, 2005. It is unlikely that ICNU's Response testimony and exhibits regarding MEHC's Application in either jurisdiction will be completed prior to that date. Granting an extension of time until November 21, 2005, for Staff, Public Counsel, and intervenors to file Response testimony regarding MEHC's Application will provide ICNU the opportunity to make a substantial

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor Street, Suite 400 Portland, OR 97204 Telephone (503) 241-7242 contribution to the record in this proceeding. A more robust record in this proceeding is in the public interest and will ultimately benefit the Commission in determining whether MEHC's application should be approved.

WHEREFORE, ICNU respectfully requests that the Commission grant this Motion for Extension of Time.

Dated this 4th day of November, 2005.

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Respectfully submitted,

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