



Bob Ferguson

# ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

August 4, 2015

Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

RE: *Washington Utilities and Transp. Comm'n v. Pacific Power & Light Co.*  
Docket UE-144160

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and one copy of a Joint Motion to Cancel Hearing, and Certificate of Service.

Sincerely,

CHRISTOPHER M. CASEY  
Assistant Attorney General

CMC/emd  
Enclosures  
cc: Parties w/enc.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT  
COMPANY,

Respondent.

DOCKET UE-144160

JOINT MOTION TO CANCEL  
HEARING

**I. INTRODUCTION**

1 Staff of the Washington Utilities and Transportation Commission (“Commission”),  
Pacific Power & Light Company (“Pacific Power”), the Renewable Energy Coalition, and  
Boise White Paper, LLC (collectively, the “Parties”) submit this Joint Motion to Cancel  
Hearing pursuant to WAC 480-07-375.

**II. RELIEF REQUESTED**

2 The Parties jointly request that the Commission cancel the hearing scheduled for  
August 14, 2015.

**III. STATEMENT OF FACTS**

3 On December 29, 2014, Pacific Power filed a tariff revision with the Commission  
updating its avoided cost tariff, Schedule 37. The Commission suspended operation of the  
tariff on February 12, 2015, by Order 01 entered in this docket.

4 On April 23, 2015, the Commission convened a prehearing conference, during which  
the Parties proposed a procedural schedule that included a “BAP-style hearing, if  
necessary.”<sup>1</sup> Administrative Law Judge Moss noted—and the parties agreed—that it

---

<sup>1</sup> Transcript of Prehearing Conference at 8, *Wash. Utils. & Transp. Comm’n v. Pacific Power & Light Co.*,  
Docket UE-144160.

appeared the case would either settle or “be resolved more or less on the basis of a paper record.”<sup>2</sup> In Order 02, the Commission established the procedural schedule, as proposed by the Parties.

5           On July 31, 2015, after all written testimony had been filed, the Parties each agreed that the hearing scheduled for August 14, 2015, is not necessary, and that the case is best resolved on the basis of a paper record. The Parties also reviewed their respective calendars to see if they could accommodate an earlier briefing schedule, but determined they could not due to their respective prior obligations. Accordingly, the Parties each agreed that the hearing should be canceled, and that the remainder of the procedural schedule should be maintained.

#### IV. STATEMENT OF ISSUES

6           Whether the Commission should grant the Parties’ joint request to cancel the hearing because the Parties each agree that a hearing is not necessary, and that the case is best resolved on the basis of a paper record?

#### V. EVIDENCE RELIED UPON

7           Transcript of Prehearing Conference, *Wash. Utils. & Transp. Comm’n v. Pacific Power & Light Co.*, Docket UE-144160, April 23, 2015.

#### VI. ANALYSIS AND CONCLUSION

8           The Commission should grant the joint request of the Parties to cancel the hearing. A party may make a procedural motion under WAC 480-07-375(1)(b). Pursuant thereto, the Parties submit this Joint Motion to Cancel Hearing. At the prehearing conference, the Parties proposed that the procedural schedule included a hearing, but anticipated that it might not be necessary.<sup>3</sup> Now that written testimony is complete, the Parties all agree that the hearing is

---

<sup>2</sup> *Id.* at 9.

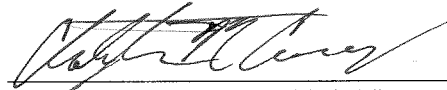
<sup>3</sup> *Id.* at 8.

not necessary, and that the case is best resolved on the basis of a paper record. The Parties further agree that the procedural schedule, post-hearing, should be maintained as established in Order 02. The Commission should grant the joint request of the Parties to cancel the hearing.

DATED this 4th day of August, 2015.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General



CHRISTOPHER M. CASEY  
Assistant Attorney General  
Counsel for Washington Utilities and  
Transportation Commission Staff



DUSTIN TILL  
Counsel for Pacific Power & Light Company

*for  
Per email*



IRION A. SANGER  
Counsel for Renewable Energy Coalition

*for  
Per email*



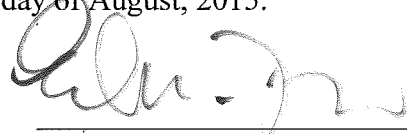
Tyler Pepple  
Counsel for Boise White Paper, LLC

*for  
Per email*

Docket UE-144160  
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Joint Motion to Cancel Hearing 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 4th day of August, 2015.



---

ELIZABETH M. DeMARCO

***For Pacific Power & Light Co.:***

Dustin Till  
Senior Counsel  
Pacific Power & Light Co.  
825 NE Multnomah, Suite 1800  
Portland, OR 97232  
Phone: (503) 813-6589  
Email: [dustin.till@pacificorp.com](mailto:dustin.till@pacificorp.com)  
[Bryce.dalley@pacificorp.com](mailto:Bryce.dalley@pacificorp.com)

***For Renewable Energy Coalition:***

Irion Sanger  
Sanger Law, P.C.  
1117 SE 53<sup>rd</sup> Ave.  
Portland, OR 97215  
Phone: (503) 756-7533  
Email: [irion@sanger-law.com](mailto:irion@sanger-law.com)  
[jravenesanmarcos@yahoo.com](mailto:jravenesanmarcos@yahoo.com)

***For Boise White Paper:***

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 SW Taylor, Suite 400  
Portland, OR 97204  
Phone: (503) 241-7242  
Email: [tcp@dvclaw.com](mailto:tcp@dvclaw.com)  
[mjd@dvclaw.com](mailto:mjd@dvclaw.com)