

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION
COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-151871 and
UG-151872

AGREED MOTION FOR
EXTENSION OF TIME

1. Pursuant to WAC 480-07-385, Public Counsel respectfully requests a short extension of time for parties to file their opening briefs in the above-captioned matter. Public Counsel requests the deadline be extended from the current deadline of August 26, 2016, to August 30, 2016. Additionally, Public Counsel requests the deadline for the reply brief be extended from September 9, 2016, to September 19, 2016.
2. Public Counsel currently has one attorney covering an active litigation schedule that has included the evidentiary hearing in this case on August 1 and 3, 2016, mediation proceedings in Puget Sound Energy's Liquefied Natural Gas docket (Docket UG-151663),¹ and filing testimony and preparing for settlement conferences in Avista Corporation's general rate case (Dockets UE-160228 and UG-160229).² The slight extension for the opening brief will significantly aid in Public Counsel's ability to adequately prepare its brief in this matter. The other parties to the

¹ Parties met on August 9, 2016, at the Commission's headquarters in Olympia. Additionally, the third-party consultant's report was issued on Friday, August 19, 2016, and parties will meet again in Seattle on August 26, 2016, to discuss the report's findings.

² Response testimony was filed on August 17, 2016, and settlement conferences are scheduled in Olympia on August 24 and 25, 2016.

case, Puget Sound Energy, Commission Staff, SMACNA-WW, and WSVACCA, have no objection to Public Counsel's request.

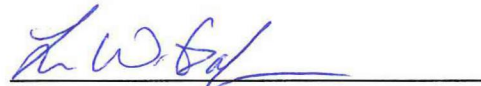
3. Altering the date for the opening brief necessitates moving the date of the reply briefs. The earliest workable date was September 19, 2016, because one party will be out of the country between August 30, 2016 and September 15, 2016. As such, the Parties have no objection to Public Counsel's request with respect to the reply brief.

4. Public Counsel does not request altering the suspension date for this matter, and Puget Sound Energy does not waive the suspension date.

5. This motion confirms the electronic mail Public Counsel sent to the Administrative Law Judge and Parties on August 19, 2016, stating that it would file a motion for extension. To the extent waiver is required with respect to WAC 480-07-385(3)(a), Public Counsel filed this motion as soon as possible after learning that Parties would not object. Because the extensions requested are short, Public Counsel does not believe they will result in prejudice to the Parties or the Commission and respectfully requests the motion be granted.

6. DATED this 22th day of August, 2016.

ROBERT W. FERGUSON
Attorney General



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