## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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AVISTA CORPORATION, dba AVISTA UTILITIES,

Respondent.

DOCKETS UE-150204 and UG-150205 (Consolidated)

COMMISSION STAFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL ARGUMENT ON BRIEF

## **MOTION**

Relief requested: Pursuant to WAC 480-07-375(1)(d) and 480-07-395(5), Staff of the Washington Utilities and Transportation Commission requests leave to file a concise supplemental argument to the Staff Brief filed November 4, 2015.

Statement of facts/issues: Commission Staff requested that its counsel present argument more clearly and forcefully on the issue of attrition. The argument is brief, does not burden the record, and its inclusion does not exceed the 60-page brief limitation.

DATED this 4th day of December 2015.

Respectfully submitted,

ROBERT W. FERGUSON Attorney General

SALLYBROWN

Senior Assistant Attorney General Counsel for Washington Utilities and Transportation Commission Staff