

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

THE WALLA WALLA COUNTRY  
CLUB,

Complainant,

v.

PACIFICORP, d/b/a PACIFIC POWER &  
LIGHT CORP.

Respondent.

Docket No. UE-143932

COMPLAINANT'S MOTION FOR  
PERMISSION TO REPLY TO  
RESPONDENT'S AFFIRMATIVE  
DEFENSES

**I. MOTION**

1 COMES NOW the Walla Walla Country Club ("WWCC"), pursuant to WAC 480-07-370(1)(d)(ii), and submits this motion for permission to reply to three affirmative defenses set forth in Pacific Power's Answer to Complaint. A reply is appropriate because the Affirmative Defenses raise new material or other reasons that warrant a response to legal and factual allegations.

2 First, based upon the record in this matter including the Federal Court litigation, Pacific Power represents that this dispute was within the expertise, authority and regulation of the Commission. Second, the disputed charges under the Tariff and Rule 6 are solely between Complainant and Respondent and thus the property parties are before the Commission. Finally,

PAGE 1- THE WALLA WALLA COUNTRY CLUB'S MOTION FOR PERMISSION TO  
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{S1066137; 1 }

an assertion that this matter is barred by the statute of limitations is disingenuous and fails to acknowledge the continuing demand for removal of electric facilities.

## II. CONCLUSION

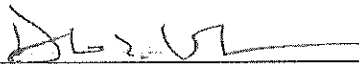
3 The WWCC respectfully requests that the Commission grant this Motion for Permission to Reply to Pacific Power's Affirmative Defenses identified herein.


Respectfully submitted,

DATED this 17<sup>th</sup> day of December, 2014.

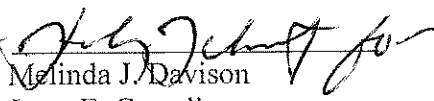
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