



is established as ten days in RCW 34.05.470(1). Therefore, unless the service of the final order was flawed, the Commission may not grant the request.

6 WAC 480-09-710(2) states, “Notices of appearance and withdrawal. Attorneys . . . appearing on behalf of a party must immediately notify the Commission and all parties to the proceeding.” Not only is the subsection headed “Notices of appearance . . .,” but it requires that the attorney “notify” the Commission and the parties of the appearance.

7 A pleading in the proceeding, of itself, does not notify others that counsel is representing the party for all purposes or that service must be directed to the representative. Merely submitting a pleading on behalf of a party, therefore, does not satisfy the Commission rule. Consequently, service of the final order was not insufficient and the Commission has no authority under the statute to grant an extension of time for submitting a petition for reconsideration.

Dated at Olympia, Washington and effective this      day of March, 2001.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARILYN SHOWALTER, Chairwoman

RICHARD HEMSTAD, Commissioner