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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

CITY OF KENT,

Petitioner,

DOCKET NO. UE-010778
(Consolidated)

v.

PUGET SOUND ENERGY, INC.,

Respondent.

.....
CITY OF AUBURN, CITY OF
BREMERTON, CITY OF DES MOINES,
CITY OF FEDERAL WAY, CITY OF
LAKEWOOD, CITY OF REDMOND, CITY
OF RENTON, CITY OF SEATAC, AND
CITY OF TUKWILA,

Petitioners,

DOCKET NO. UE-010911
(Consolidated)

v.

PUGET SOUND ENERGY, INC.,

Respondent.

CITIES' MOTION FOR EXTENSION
OF TIME

The Cities, for their Motion for Extension of Time, state as follows:

1. The Cities request an extension of time of one week until Wednesday, August 15, 2001, in which to file their Motion for Summary Adjudication. The parties have worked together diligently to agree upon a Comprehensive Issues List, Stipulation of Material Facts, and

1 Identification of Contested Material Facts and to develop an exhibit list. During the course of these
2 discussions, it has become apparent that there are several contested issues of material fact that will
3 require preparation of declarations and other materials in support of the Cities' Motion for Summary
4 Adjudication.

5 2. The Cities need additional time in which to prepare these materials. For these
6 reasons, the Cities request an extension of time until August 15, 2001 to file their Motion for
7 Summary Adjudication.

8 3. Counsel for Puget Sound Energy and Commission Staff have indicated they do not
9 object to this extension of time. However, these parties request that the time for filing responsive
10 and reply briefs be extended by one week as well for all parties. Kent does not join in this motion.

11 4. The Cities request that the procedural schedule established in the Prehearing
12 Conference Order be amended as follows:

| | |
|-----------------------------------|-------------------|
| Motions for Summary Determination | August 15, 2001 |
| Responses to Motions | August 27, 2001 |
| Replies to Responses | September 3, 2001 |

15 DATED this 2nd day of August, 2001.

16 Respectfully submitted,

17 PRESTON GATES & ELLIS LLP

18
19 By _____
20 Carol S. Arnold, WSBA # 18474
21 Laura K. Clinton, WSBA # 29846
22 Attorneys for Petitioners
23 Cities Of Auburn, Bremerton, Des Moines, Federal
24 Way, Lakewood, Redmond, Renton, SeaTac, and
25 Tukwila
26

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the CITIES' MOTION FOR EXTENSION OF TIME, filed by the Cities of Auburn, Bremerton, Des Moines, Federal Way, Lakewood, Redmond, Renton, SeaTac, and Tukwila, upon all parties of record in this proceeding, via facsimile, followed by U.S. mail, as follows:

Kirstin S. Dodge
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Woodinville, WA 98072-8876

Dennis J. Moss, Administrative Law Judge
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P. O. Box 47250
Olympia, WA 98504-7250

DATED at Seattle, Washington, this 1st day of August, 2001.

Jo Ann Sunderlage
Secretary to Carol S. Arnold