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February 1, 2013

David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, Washington 98504-7250

RE: *In the Matter of the Petition of PUGET SOUND ENERGY, INC., For Approval of a Power Purchase Agreement for Acquisition of Coal Transition Power, as Defined in RCW 80.80.010, and the Recovery of Related Acquisition Costs*
Docket UE-121373

Dear Mr. Danner:

Enclosed for filing in the above-referenced docket are the original and ten copies of Commission Staff's Motion for 30-day Extension of Time to File Answers to Puget Sound Energy's Petition for Reconsideration and Motion to Reopen the Record, and Certificate of Service.

Sincerely,

SALLY BROWN
Senior Assistant Attorney General

SGB:klg
Enclosures
cc: Parties

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.,

For Approval of a Power Purchase
Agreement for Acquisition of Coal
Transition Power, as Defined in RCW
80.80.010, and the Recovery of Related
Acquisition Costs

DOCKET UE-121373

MOTION FOR 30-DAY EXTENSION
OF TIME TO FILE ANSWERS TO
PUGET SOUND ENERGY'S
PETITION FOR RECONSIDERATION
AND MOTION TO REOPEN THE
RECORD

1 The Staff of the Washington Utilities and Transportation Commission requests that the Commission extend the time for filing answers to the Petition for Reconsideration and Motion to Reopen the Record filed by Puget Sound Energy in Docket UE-121373, by 30 days, from February 6, 2013, to March 8, 2013. Puget Sound Energy, Inc. (Puget Sound Energy or PSE) has authorized Staff to represent its agreement with this request.¹

2 The standard applicable to Staff's request is contained in WAC 480-07-385(2):

The commission will grant a continuance if the requesting party demonstrates good cause for the continuance and the continuance will not prejudice any party or the commission. The commission will grant a timely request to which all parties expressly agree unless it is inconsistent with the public interest or the commission's administrative needs.

3 Staff and PSE agree that this continuance will allow the parties time to reach a resolution of not only the TransAlta Centralia power purchase agreement docket (Docket UE-121373), but also PSE's decoupling dockets (Dockets UE-121697 and UG-121705), as

¹ Staff also directs the Commission's attention to WAC 480-07-850(5), which states: "A petition for reconsideration is deemed denied twenty days after the date the petition is filed, unless the commission either: (a) Enters an order resolving the petition; or (b) Serves the parties with a written notice specifying the date by which it will act on the petition." *Accord*, RCW 34.05.470(3).


well as PSE's expedited rate filing (ERF) dockets (Dockets UE-13XXXX and UG-13XXXX), which Staff anticipates will be filed by PSE this afternoon.² The requested continuance should not prejudice any of the parties to this case. Furthermore, the requested extension of time is not inconsistent with the public interest or the Commission's administrative needs. Indeed, the public interest will be served by a global resolution of the five dockets referenced above. Good cause, therefore, exists for the Commission to grant the requested extension of time.

4 For these reasons, the Motion for Extension of Time should be granted by the Commission.

DATED this 1st day of February 2013.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



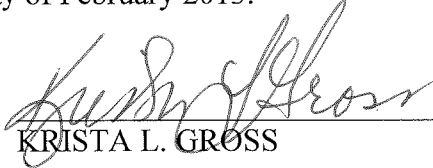
SALLY BROWN
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

² See, In the Matter of the Petition of Puget Sound Energy, Inc. and NW Energy Coalition, for an Order Authorizing PSE to Implement Electric and Natural Gas Decoupling Mechanisms and to Record Accounting Entries Associated with the Mechanisms, Dockets UE-121697 and UG-121705; In the Matter of Puget Sound Energy, Inc.'s Expedited Rate Filing, Dockets UE-13XXXX and UG-13XXXX.

Docket UE-121373
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Motion for Extension of Time to File Answers to Puget Sound Energy's Petition for Reconsideration and Motion to Reopen the Record, upon the persons and entities listed on the Service List below via email and by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 1st day of February 2013.


KRISTA L. GROSS

HC=Highly Confidential

C=Confidential

NC=Non-Confidential

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