**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant,v.PACIFIC POWER & LIGHT COMPANY, Respondent. | ))))))))))) | DOCKET UE-152253MOTION FOR EXTENSION OF TIME OF BOISE WHITE PAPER, L.L.C. AND PUBLIC COUNSEL |

1. Pursuant to WAC § 480-07-385, Boise White Paper, L.L.C. (“Boise”) and the Public Counsel Unit of the Attorney General’s Office (“Public Counsel”) (collectively, the “Joint Parties”) file this motion for extension of time (“Motion”). Specifically, the Joint Parties respectfully request a two business day extension of time to respond to Bench Request Nos. 1 and 2, thereby allowing the Joint Parties to respond no later than 3:00 p.m., Monday, April 4, 2016. Approval of the Motion will allow the Joint Parties a modest time extension in order to fully and accurately prepare responses.
2. The Joint Parties have asked all other parties in this proceeding whether any party opposes this two business day extension of time. All other parties have responded and none have indicated opposition to the time extension request.
3. To the extent necessary, the Joint Parties request an exemption from the rule requirement that a motion for continuance be filed at least five business days prior to the deadline for which continuance is sought.[[1]](#footnote-2)/ As the Notice of Bench Requests was issued and served on March 29, 2016, two business days prior to the response due date for Bench Request Nos. 1 and 2, compliance with the five business day rule requirement is not possible. Moreover, the Motion has been filed just one day after service of the Notice of Bench Requests, and the Joint Parties have endeavored to present this request for a time extension in an expedient fashion.
4. The Joint Parties request the additional time to respond because it is unlikely that either party will be able to ensure fully accurate compliance with the Bench Requests by Thursday, March 31, 2016, at 3:00 p.m. While witnesses will be diligent in preparing responses, numerous schedules will need to be updated to reflect the proposed adjustments from the per-books figure, rendering accuracy challenging within the originally allotted response period.

Dated this 30th day of March, 2016.

Respectfully submitted,

*/s/ Jesse E. Cowell*

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1. / WAC § 480-07-385(3)(a). [↑](#footnote-ref-2)