

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of) DOCKET UW-143617
) (*Consolidated*)
)
T & T PROFESSIONAL SERVICE aka)
WATER AND WASTEWATER) AGREED REQUEST FOR A
MANAGEMENT SERVICES, LLC,) CONTINUANCE
ROBERT THURSTON, and CHERI)
THURSTON)
)
For an Order Approving the Transfer of)
Piper Water System, Pinewood Water)
System, and Lightmoor Court Water System)
.....)
WASHINGTON UTILITIES AND) Docket UW-150791
TRANSPORTATION COMMISSION,) (*Consolidated*)
)
Complainant,)
)
v.)
)
)
T & T PROFESSIONAL SERVICE aka)
WATER AND WASTEWATER)
MANAGEMENT SERVICES, LLC,)
ROBERT THURSTON, and CHERI)
THURSTON)
)
Respondent.)
.....)

I. AGREED REQUEST FOR CONTINUANCE

1 Commission Staff (“Staff”), T & T Professional Service aka Water and Wastewater Management Services LLC (“T&T” or “Company”) through its representatives Cheri and Robert Thurston, Intervener Ms. Robin Moeur on behalf of Piper System, and Intervener Mr. Jason Younkers on behalf of Lightmoor System (collectively “Parties”) hereby file an agreed request under WAC 480-07-385 to postpone the proceeding in Dockets UW-143617 and UW-150791 (consolidated) presently-scheduled for August 5, 2015. The Parties request the Commission reschedule the brief adjudicative proceeding (“BAP”) in the above-noted dockets for Friday, August 28, 2015. The Parties further request that the Commission extend the date for filing exhibits to no later than 5:00 pm on Thursday, August 20, 2015.

2 The Parties are currently in the process of settlement negotiations. The Parties require additional time to finalize partial settlement agreements and determine whether and to what extent to litigate any remaining disputes. The Parties anticipate filing partial settlement agreements with one, and maybe two, of the Company’s water systems involved in this case. At the very least, the Parties anticipate joint proposals to reduce the scope of the dispute before the Commission. Staff, the Company, and Interveners can be available for a status conference to discuss the Parties’ agreed request for a continuance and status of remaining contested issues.

II. WAC 480-07-385

3 Under WAC 480-07-385(1)(b), a continuance to which all parties agree is an “agreed request.” WAC 480-07-385(2) goes on to state “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.” Additional time for the Parties to develop

informed recommendations and potentially resolve contested issues serves the public interest and avoids unnecessary litigation, time, and expenses.

III. SUMMARY OF PARTIES' POSITIONS AND ARGUMENT

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The Parties agreed request for a continuance is consistent with the public interest and the Commission's administrative needs. First, a continuance will likely avoid unnecessary litigation and expense. It is not in the public interest to expend time and resources litigating a matter to which Parties actually agree. Second, a continuance serves the Commission's administrative needs by allowing the Parties to present a more limited dispute, if any, for the Commission's consideration at a later date. Like any organization, the Commission has finite resources and should not expend those resources to administer an unnecessary-long or –complex proceeding. Such a scenario would waste Commission resources and add significant, unnecessary costs for all Parties involved. The Commission should thus grant the extension to allow for further settlement discussions and avoid unnecessary litigation

IV. PROPOSED SCHEDULE

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The Parties agree to the following schedule. First, the Parties propose the Commission reschedule the BAP for August 28, 2015. Second, the Commission should reset the deadline for submitting exhibits in this case to August 20, 2015. As noted above, the Parties anticipate filing a partial settlement agreement between now and August 28, 2015. In the event there are no settlements, the Parties would proceed to hearing on August 28, 2015.

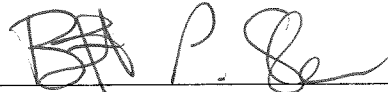
V. CONCLUSION

6 For the above reasons, the Parties respectfully ask the Commission grant this agreed request for a continuance and extend the hearing schedule as described above.

DATED this 28th day of July 2015.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



BRETT P. SHEARER
Assistant Attorney General

Counsel for Washington Utilities and
Transportation Commission Staff

CHERI THURSTON
Owner
T & T Professional Service aka Water and
Wastewater Management Services, LLC

ROBIN MOEUR
Representative for Customers of Piper Water
System

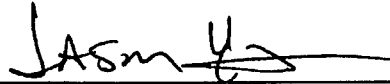
JASON YOUNKER
Representative for Customers of Lightmoor
Court Water System

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