

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

CLUTTER, INC.,

Petitioner,

Seeking Exemption from Tariff 15-C
and certain provisions of WAC 480-15

DOCKET TV-210535 AND
DOCKET TV-210812
(*Consolidated*)

PUBLIC COUNSEL RESPONSE TO
CLUTTER, INC.'S MOTION TO
EXTEND EXEMPTION DATE IN
ORDER 01

1. Pursuant to WAC 480-07-385(3)(a), the Public Counsel Unit of the Washington State Attorney General’s Office (“Public Counsel”) responds to Clutter, Inc.’s (“Clutter”) Motion for to Extend Exemption Date in Order 01,¹ filed with the Washington Utilities and Transportation Commission (“Commission”) on April 20, 2022. Clutter seeks an extension of exemptions from certain provisions of Chapter 480-15 Washington Administrative Code (WAC) and Tariff 15-C that are set to expire on May 1, 2022. The Commission previously granted these exemptions in Order 01 in this proceeding.² Clutter requests the Commission extend the exemptions “until the earlier of: 1) December 31, 2022, 2) the date Commission ends the investigation into Tariff 15-C changes, or 3) the effective date of new rules or amendments to Tariff 15-C.”³
2. In principle, Public Counsel does not oppose an extension of the exemptions. The discussions regarding modifications to Tariff 15-C are ongoing, and it would be against the public interest to remove the exemptions at this time only to modify the same provisions in the

¹ Motion to Extend Exemption Date in Order 01, Clutter, Inc. (April 20, 2022) [hereinafter “Clutter Motion”].


² *In re Clutter*, Docket TV-210535, Order 01 (Oct. 14, 2021).

³ Clutter Motion ¶ 4.

near future. Public Counsel notes, however, that WAC 480-07-385(4) states the Commission will grant continuances only to a specified date. Public Counsel therefore recommends that the Commission either grant the continuance until December 31, 2022, with an option for Clutter to seek further continuances if necessary, or explicitly waive the requirement for a date certain and grant either of the other requested options.

DATED this 25th day of April 2022.

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