

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET UG-210755

PUBLIC COUNSELS MOTION TO  
EXTEND TIMELINE FOR PUBLIC  
COUNSEL LETTER

**I. INTRODUCTION**

1. In accordance with WAC 480-07-385(2), the Public Counsel Unit of the Washington State Attorney General’s Office (Public Counsel) files this Motion to Extend the Deadline for Public Counsel to file its letter in connection with the collaborative resolution the Washington State Utilities and Transportation Commission (UTC or Commission) ordered in Final Order 09 to be in Cascade Natural Gas Corporation’s (Cascade or the Company) 60-day compliance filing.<sup>1</sup> Public Counsel requests a one-week extension, such that Public Counsel be allowed to file a letter no later than Friday, October 28, 2022.

**II. REQUEST TO EXTEND THE DEADLINE FOR PUBLIC COUNSEL LETTER**

2. Public Counsel requests that the Commission allow Public Counsel up to one additional week to file its letter expressing its views regarding the collaborative resolution the Commission

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<sup>1</sup> WAC 480-07-385(2); *see Wash. Utils. & Transp. Comm’n v. Cascade Nat. Gas Corp.*, UG-210755 Order 09 ¶¶ 178–181 & fn.184 (Aug. 23, 2022).

ordered in Final Order 09.<sup>2</sup> Up to one additional week is needed for Public Counsel to complete its authorization process to file the letter.

3. Final Order 09 requires the parties in this Docket to work collaboratively to address in this proceeding the Protected-Plus Excess Deferred Income Tax (PP EDIT) reversals at issue in this Docket as well as the requested PP EDIT treatment modifications at issue in Docket UG-220198.<sup>3</sup> Further, Final Order 09 requires the parties to “work collaboratively on the proper going-forward treatment using the guidance in this Order and direct Cascade to make a compliance filing reflecting the collaborative resolution of this issue within 60 days of the effective date of this Order.”<sup>4</sup> In footnote, the Commission clarifies that the compliance filing

must include proposed relevant tariff sheet(s), a detailed description of the changes made (including impact(s) on revenue requirement), an updated revenue requirement Excel spreadsheet where all cells manually changed are highlighted, and a document signed by all parties that participated in the collaborative stating that the compliance filing is a fair resolution of the issue of including PP EDIT in base rates going forward and no longer passing those amounts back through a separate schedule.<sup>5</sup>

4. Public Counsel is a unit within the Washington State Office of the Attorney General that advocates on behalf of residential and small business ratepayers in proceedings before the UTC.<sup>6</sup> In formal adjudications before the UTC, Public Counsel must obtain authorization regarding its positions.

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<sup>2</sup> See *Wash. Utils. & Transp. Comm'n v. Cascade Nat. Gas Corp.*, UG-210755 Order 09 ¶¶ 178–181 & note 184 (Aug. 23, 2022).

<sup>3</sup> See *id.*

<sup>4</sup> *Id.* ¶ 181.

<sup>5</sup> *Id.* ¶ 181 & fn.184.

<sup>6</sup> See RCW 80.01.100, RCW 80.04.510, & RCW 81.04.500.

5. Although Public Counsel began that process in roughly mid-September 2022, up to one additional week is necessary for Public Counsel to obtain the authorization it needs. Public Counsel began its efforts to submit this request for an extension of time as soon as it became aware that more time is needed. Public Counsel alerted parties via email that such a request might be necessary on October 20, 2022.

## I. CONCLUSION

6. Public Counsel respectfully requests that the Commission allow Public Counsel to file its letter regarding the 60-day compliance filing in this Docket to Friday, October 28, 2022.

Dated in Seattle, Washington this 21st day of October, 2022.

ROBERT W. FERGUSON  
Attorney General

/s/ *Ann Paisner*

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