

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,
Complainant,

v.

T&T PROFESSIONAL SERVICE aka
WATER AND WASTEWATER
MANAGEMENT SERVICES LLC,
ROBERT THURSTON and CHERI
THURSTON

Respondent.

DOCKETS UW-143617 AND
UW-150791 (*consolidated*)

STAFF'S MOTION FOR AN
EXTENSION OF TIME TO FILE
EXHIBITS

I. REQUEST FOR A CONTINUANCE

1 Under WAC 480-07-385, a party may request a continuance by written or oral motion. A must file written motions for continuance at least five business days before the applicable deadline, but the commission may consider requests for continuance that are made after the deadlines stated in this rule if the requester demonstrates good cause that prevented a timely request.

II. ARGUMENT

2 The Commission should grant a continuance for Staff and/or the relevant intervener to file an exhibit in the above dockets. Staff has learned that the customers of Piper Water System, one of the three systems involved in the above dockets, and the Company appear to

have agreed in principal to terms and conditions to effectuate a transfer of that system. The Company and its customers for that particular water system are in the process of documenting their agreement in writing. Staff would like to review that agreement and possibly offer the document as an exhibit at the Brief Adjudicative Proceeding scheduled for August 28, 2015. The specifics of that agreement would likely impact Staff's recommendation regarding the Piper Water System, which, as noted above, is one of the three systems involved in the above dockets. Because that agreement is still being finalized, Staff requests a continuance through Wednesday, August 26, 2015, to file the document as an exhibit. Staff has filed a witness list and exhibit list to indicate the potential inclusion of the agreement between T&T Water and its customers of the Piper Water System.

III. GOOD CAUSE FOR A LATE REQUEST FOR CONTINUANCE

3 There exists good cause for a continuance and such continuance would be in the public interest. First, the relevant parties have worked as quickly as possible to both come to an agreement and draft something. There are multiple parties involved in discussions and arranging schedules is difficult, particularly during the summer in an accelerated proceeding. Second, it is important that the Commission have all of the relevant information available at the Brief Adjudicative Proceeding. If there is an agreement between parties in this case, the Commission and the public interest would benefit from including that agreement in its review process. A complete record of all relevant information will assist the Commission in determining the most fair and reasonable outcome. Third, no other party will be prejudiced by the continuance. There are three water systems involved in this case. The potential agreement between customers of one system and the Company do not impact the customers of the other systems. There is also no prejudicial impact to the Company, as it is a party to

the agreement and would remain in the case. Lastly, the potential resolution of a significant portion of this docket through an agreement would preserve Commission resources and avoid unnecessary litigation.

DATED this 20th day of August 2015.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General

A handwritten signature in black ink, appearing to read "B.P. Shearer", written over a horizontal line.

BRETT P. SHEARER
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff