## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

OLYMPIC PIPE LINE COMPANY, INC.,

Respondent.

## DOCKET NO. TO-011472

MOTION FOR RECONSIDERATION OR CLARIFICATION OF THE COMMISSION'S JULY 19, 2002, PREHEARING CONFERENCE ORDER

- This Motion is filed on behalf of Commission Staff. Staff seeks reconsideration or clarification on certain aspects of the Commission's July 19, 2002 Prehearing Conference Order ("Order"). In that Order, a consistent briefing format for all parties was established, as well as other terms and conditions regarding preparation of the briefs in this case.
- Clarification or reconsideration is requested with regard to paragraph 15 of the Order. No page limit is set forth in the Order for the "attachment" document containing draft findings, conclusions of law, and tables. Staff had suggested that each party be permitted to file a results of operations exhibit, but that was opposed by Olympic. A ten page limit was then discussed, and apparently selected on a tentative basis, at least. But whatever limit is selected by the Commission, it should be contained in the Order.
- *3* Staff also requests the filing deadlines be stated in the order.

- Clarification or reconsideration is requested with regard to outline Section IV.B.iii.4, entitled
  "Parent's capital structure." Staff requests there be added "and methodology for cost of equity" since FERC has a methodology for cost of equity as well as a methodology for capital structure. Or "methodology for cost of equity" could be a separate item IV.B.iii.5.
- 5 Clarification or reconsideration is requested with regard to outline Section IV.B.ii., entitled "Rationale for FERC methodology." To the extent there are other FERC rationales than the sole item listed in this category, Staff requests the Commission to clarify that those other rationales should be discussed under IV.B.ii, prior to item 1. If this is not the proper location, Staff requests the Commission to indicate the proper location.

Respectfully submitted this \_\_\_\_\_ day of July, 2002.

CHRISTINE O. GREGOIRE Attorney General

DONALD T. TROTTER Senior Counsel