

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

OLYMPIC PIPE LINE COMPANY, INC.,

Respondent.

DOCKET NO. TO-011472

OLYMPIC PIPE LINE COMPANY'S
REQUEST FOR PERMISSION TO
REPLY TO ANSWER OF
COMMISSION STAFF

I. INTRODUCTION

1. Pursuant to WAC 480-09-425(3)(b), Olympic Pipe Line Company (“Olympic”) formally requests permission from the Washington Utilities and Transportation Commission (“Commission”) to reply to the Answer on Behalf of Commission Staff Opposing Olympic’s Petition for Administrative Review of Evidentiary Ruling, dated September 19, 2002 (“Answer”). The names and addresses of Olympic and its representatives are as follows:

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2. This Request involves the following regulations and rules: WAC 480-09-425, WAC 480-09-760, and WAC 480-09-780.

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II. DISCUSSION

3. In its Answer, Commission Staff argues that “Olympic’s Petition should be rejected because Olympic failed to comply with the time limits in WAC 480-09-760.” Answer at ¶2. If the Commission were to grant Olympic’s request for permission to reply, then Olympic would show (a) that Olympic’s Petition for Administrative Review of Evidentiary Ruling (“Petition”) was correct under WAC 480-09-780; (b) that Olympic’s Petition was timely under WAC 480-09-780; and (c) regardless of the procedural rules used, the Commission should consider Olympic’s Petition on its merits and not dismiss its arguments because of a technicality.

4. Consistent with WAC 480-09-425(3)(b), Olympic has attached a Proposed Reply to Answer of Commission Staff.

III. PRAYER FOR RELIEF

5. Olympic respectfully requests that the Commission to grant Olympic permission to file a reply to Commission Staff’s Answer.

DATED this ____ day of September, 2002.

Respectfully submitted,

PERKINS COIE LLP

By _____
Steven C. Marshall, WSBA #5272
Attorneys for Olympic Pipe Line Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 24, 2002, I caused to be served copies of Olympic Pipe Line Company's Request for Permission to Reply to Answer of Commission Staff and Proposed Reply to Answer of Commission Staff via email, facsimile, and U.S. Mail to the following parties:

Mr. Donald T. Trotter
Ms. Lisa Watson
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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this ____ day of September, 2002, in Bellevue, Washington.

Cindy Peterson