

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of:

PUGET SOUND ENERGY, INC.

for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc. and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services

DOCKET UG-151663

**AGREED MOTION FOR
EXTENSION OF TIME**

1. Pursuant to WAC 480-07-385, Puget Sound Energy, Inc. (PSE) respectfully requests an extension of time for the parties to file legal memoranda required by Order 04 in the referenced proceeding to address whether there may be alternative business models with structures that would fall under the Commission's jurisdiction.
2. Because of the holiday season and the number of issues that were presented in Order 04, several key PSE decision makers were unavailable to fully present Company positions on this subject. To fully address the issues, PSE proposed to the parties' an extension of time to file legal memoranda from Friday, January 15, 2016, to Friday, January 29, 2016.
3. All parties were agreeable to the extension proposed by PSE, but a suggestion was also made that there be a second round of briefing by all parties. PSE is agreeable to this suggestion and is respectfully requesting that initial briefs on the issues raised in Order 04 be filed by all parties on January 29, 2016, and that all parties be granted until Monday, February 15, 2016, to file reply briefs.
4. In addition, in accordance with the above request, PSE respectfully requests further that the hearing date for oral argument currently scheduled for January 29, 2016, also be extended.

5. Public Counsel, Northwest Industrial Gas Users (NWIGU), and UTC Commission Staff support the requests made in this motion.

6. DATED this 8th day of January, 2016.

PERKINS COIE LLP

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