

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

PACIFIC POWER & LIGHT COMPANY

2022 Power Cost Adjustment Mechanism
Annual Report.

DOCKET UE-230842

STAFF’S MOTION FOR
CONTINUANCE EXTENDING
REVIEW PERIOD OF COMPANY’S
FILING

I. INTRODUCTION

1 Pursuant to WAC 480-07-385, Commission Staff (Staff) of the Washington Utilities
and Transportation Commission (Commission) moves for a continuance to postpone the
deadline to complete the review of the Pacific Power & Light Company’s (the Company)
filing requesting extension of the amortization of the PCAM surcharge.

2 Staff seeks this continuance as it requires additional time to complete its review of
the Company’s filing. Due to staffing shortages, Staff has only recently been able to
properly assign an expert to review the Company’s filing in this matter. Staff has conferred
with the Company, which has agreed to extend the deadline to October 31, 2023. Staff has
not conferred this week with AWEC or Public Counsel.

II. RELIEF REQUESTED

3 Staff requests that the Commission continue the date for completing review of the
Company’s filing from September 15, 2023 to October 31, 2023.

III. STATEMENT OF FACTS

4 The Company filed its Petition to Extend the Amortization of the PCAM Surcharge
(the Petition) on June 15, 2023. The initial deadline was September 15, 2023, 90-days after
the Petition was filed.¹

¹ *Wash. Utils & Transp. Comm’n v. Pac. Power & Light Co.*, Dockets 140762, 140617 & 131384, Order 09, 7, ¶ 18 (May 26, 2015).

5 Staff previously requested an extension of this matter via email, and received a one-
week extension. However, giving staffing shortages at the Commission, Staff was unable to
complete review of the filing during that time period. But Staff has retained an expert to
complete review of the Company’s Petition. Staff now requests a final extension to October
31, 2023.

IV. STATEMENT OF ISSUES

6 Should the Commission continue the review deadline for the Company’s petition
from September 15, 2023 to October 31, 2023?

V. ARGUMENT

7 The Commission’s administrative rules provide for the “postponement of a deadline
established by commission rule or order,” which the Commission defines as a continuance.²
The Commission will grant a request for a continuance if the requesting party demonstrates
both good cause and that the continuance will not prejudice any other party or the
Commission.³

8 Good cause exists to continue the deadline for Staff’s review. Unavoidable and
unpreventable staffing shortages at the Commission made it impossible for Staff to
adequately review the Company’s Petition during the 90-day review period. Staff recently
contracted with an expert who can complete review of the filing, but such review requires
time. Additionally, this expert needs time to issue data requests and for the Company to
respond to such requests.

9 The continuance will not prejudice the Company. The extension requested will put
the matter on the November 9th Open Meeting, resulting in a small delay from the initial

² WAC 480-07-385(1)(a)

³ WAC 480-07-385(2)(a).

timeline. The extension will provide time for Staff to issue data requests and give the Company adequate time to respond to those requests, which will allow a more complete record when the matter comes before the Commissioners. Additionally, the Company has agreed to this extension in conversations with Staff.

10 The Commission will also not be prejudiced by the continuance. The filing contains many complexities that require time to adequately consider. Providing additional time will lead to a more thorough and complete review. This will only assist the Commission as Staff can provide a more well-rounded review for the Commissioners to consider.

11 Neither AWEC, intervenor in this matter, nor Public Counsel will be prejudiced as the additional time will provide each the same time as Staff to review, analyze, and assess the Company's filing.

VI. CONCLUSION

12 Staff requests that the Commission grant its motion for a continuance and set the deadline for Staff to review the Company's filing to October 31, 2023.

DATED this 6th day of October 2023.

Respectfully submitted,

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