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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF THE PETITION FROM RESIDENTS OF SWAN VALLEY, IRWIN AND PALISADES REQUEST­ING EXTENDED AREA SERVICE (EAS) TO ALL OF BONNEVILLE COUNTY, AND THE TOWNS OF RIRIE, VICTOR AND DRIGGS. | )  )  )  )  )  ) | CASE NOS.  GNR-T-96-6                        GNR-T-97-3                        GNR-T-97-8 |
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| IN THE MATTER OF THE PETITION FROM RESIDENTS OF GRAY’S LAKE, WAYAN AND FREEDOM REQUESTING INCLUSION IN THE U S WEST COMMUNICATIONS EASTERN IDAHO CALLING REGION.    IN THE MATTER OF THE PETITION FROM RESIDENTS OF TETON COUNTY REQUEST­ING EXTENDED AREA SERVICE (EAS) TO THE GREATER IDAHO FALLS AREA. | )  )  )  )  )  )  )  )  )  )  )  ) | STIPULATED MOTION FOR EXTENSION OF TIME FOR STAFF TO FILE A MOTION TO STRIKE |

COMES NOW the Staff of the Idaho Public Utilities Commission by and through its attorney of record, Donald L. Howell, II, Deputy Attorney General, and submits this Stipulated Motion for an Extension of Time to File a Motion to Strike a portion to U S WEST Communications’ Opposition to Proposed Order and Motion for Hearing pursuant to Rules 56 and 256.  IDAPA 31.01.01.56 and 256.  As set out in the Notice of Proposed Order, parties had 21 days to file exceptions to the Proposed Order and 7 days after service of the exceptions to file replies.  Order No. 27379 at 2.  On March 20, 1998, U S WEST Communications filed its Opposition to the Proposed Order and Motion for Hearing in above referenced cases.  In support of its Motion, the Company filed a Memorandum and an Affidavit of its counsel, Mary S. Hobson.   The deadline for filing replies to U S WEST’s exceptions to the Proposed Order is March 27, 1998.

MOTION FOR EXTENSION

The Staff respectfully requests that the Commission grant it a one business day extension in which to file a responsive and limited motion to U S WEST’s Opposition, if necessary.  In other words, the Commission Staff requests permission to file a Motion to Strike (if necessary) on March 30 (Monday) instead of March 27 (Friday).  It is the Staff’s intention to object to the introduction of Ms. Hobson’s Affidavit and references contained in the Company’s supporting memorandum unless the Company voluntarily withdraws the objectionable material by March 30, 1998.  Staff asserts that this material improperly and erroneously discloses the portions of ongoing settlement negotiations between U S WEST and the Staff.  IDAPA 31.01.01.272.  Rather than filing a lengthy objection, the Staff and the Company have agreed to a one day extension in the hopes that they may resolve this conflict.  The Company stipulates to this extension and waives its right to object to a late filed Motion to Strike on the basis of timeliness.

Although the Staff is mindful of the Commission’s desire to expeditiously process the above referenced cases, it believes granting the one day extension will not cause any hardship or prejudice any party.  In particular, the Commission is aware that the above referenced cases are similar to the Commission’s Proposed Order issued in Case Nos. ROK-T-97-1, GNR-T-96-5, and GNR-T-97-7.  Replies in these latter cases are not due to be filed until Tuesday, March 31, 1998.  Given the similarity of issues involved in these EAS cases, the Staff anticipates that the Commission would take up consideration of the outstanding Motions, exceptions and responses in all the cases after next Tuesday.  Consequently, granting the Staff a one day extension in efforts of resolving the issues surrounding the Affidavit will not result in any delay and may eliminate disputed issues in these cases.

Counsel for Silver Star Telephone and Teton Telecom has consented to this one day extension.  Attempts to contact the remaining intervenor, Roy Moulton, by telephone as required by Rule 256 were unsuccessful.  IDAPA 31.01.01.256.  His office indicated he was out of town.  However, for the reasons stated above, the Staff believes that granting the one day extension would not be prejudicial to any party and will further the interests of a prompt and just resolution of these cases.

PRAYER

Based upon the stipulation of most parties, the Commission Staff respectfully requests that the Commission grant it a one-day extension in which to file a Motion to Strike a portion U S WEST’s Motion for Hearing, if necessary.  Granting this Motion will serve the goals of conserving valuable resources, reducing the number of disputed issues in this matter, and result in greater efficiencies.

Respectfully submitted this   27th    day of March 1998.

Donald L. Howell, II

Deputy Attorney General

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