Gary G. Sackett (USB 2841)
Vincent C. Rampton (USB 2684)
JONES, WALDO, HOLBROOK & MCDONOUGH, P.C.
170 South Main, Suite 1500
Salt Lake City, Utah 84101
(801) 534-7336
gsackett@joneswaldo.com
Attorneys for InSite Towers Development, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Formal Compliant of:

Docket No. 15-066-01

INSITE TOWERS DEVELOPMENT, LLC,

:

V.

MOTION FOR INDEFINITE
STAY OF PROCEDURAL SCHEDULE

DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION, INC.

:

InSite Tower Development, LLC ("InSite") submits a Joint Motion for Indefinite Stay of Procedural Schedule in the captioned proceeding.

The parties are currently involved in active settlement proceedings that may resolve the issues raised in InSite's Complaint. Because the settlement discussions are in an early stage of development, the parties cannot predict how long it might take to resolve the matter or reach a point when these proceedings should be resumed.

If the parties do not resolve the matter, either party may seek to reactivate the proceedings before the Commission by notifying the Commission and seeking the establishment of a new procedural schedule.

InSite is authorized to represent that Dixie Escalante Rural Electric Association, Inc., and the Utah Division of Public Utilities support this motion.

Respectfully submitted this 10th day of June 2015.

JONES, WALDO, HOLBROOK & McDonough, P.C.

Gary G. Sackett

Gary G. Sackett Vincent C. Rampton Attorneys for InSite Towers Development, LLC

CERTIFICATE OF SERVICE

I certify that I have served on the following persons a copy of the foregoing MOTION FOR INDEFINITE STAY OF PROCEDURAL SCHEDULE by e-mail this 10th day of June 2015.

Gary G. Sackett

Gary G. Sackett

DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION, INC.

David F. Crabtree crabtree@deseretgt.com

UTAH DIVISION OF PUBLIC UTILITIES

Patricia E. Schmid Justin C. Jetter Assistant Attorneys General pschmid@utah.gov

Dennis Miller Dennismiller@utah.gov