

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-111048

Docket No. UG-111049

PUGET SOUND ENERGY, INC.'S
MOTION FOR LEAVE TO FILE
REVISED TESTIMONY

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE") hereby requests that the Commission grant it leave to file the revised prefiled direct testimony submitted with this motion. The purpose of this revised evidence is to amend the prefiled direct testimony of John H. Story to withdraw PSE's proposal for a deferred tax receivable tracker.

2 PSE filed its prefiled direct evidence in this general rate case proceeding on June 13, 2011. In its filing PSE requested that the Commission approve a deterred tax receivable tracker. Since filing its testimony, and after discussions with other parties, PSE has decided to withdraw its request for the tracker. Accordingly, PSE requests permission to file revised Prefiled Direct Testimony of John H. Story, Exhibit No. ____ (JHS-1T) that removes PSE's proposal for a deferred tax receivable tracker.

3 The Commission's procedural rules require PSE to seek leave for filing its proposed revisions because they go beyond revisions to correct mistakes:

PSE's MOTION FOR LEAVE
TO FILE REVISED
TESTIMONY - 1
07771-0185/LEGAL21912365.1

Perkins Coie LLP
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
Phone: (425) 635-1400
Fax: (425) 635-2400

Parties must seek leave from the presiding officer by written motion if they wish to submit testimony that includes substantive changes other than to simply correct errors of fact asserted by a witness. A party proposing such changes may submit the proposed revisions with its motion.

WAC 480-07-460(1)(b)(ii). PSE therefore files this motion seeking such leave.


4 PSE's motion should be granted. The proposed revised testimony has no impact on PSE's overall revenue requirement in this general rate case. PSE's revision will remove one issue from this proceeding, thereby simplifying the remaining evidence. Allowing the revised testimony will reduce the burden on other parties that would otherwise result from examining the deferred tax tracker in data requests and in response testimony. Therefore, the parties to this proceeding will not be disadvantaged by this filing. Finally, PSE has advised WUTC Staff and Public Counsel of its intent to propose these revisions and, therefore, the parties should not be hampered in developing their response testimony in this proceeding.

5 For the reasons set forth above, PSE respectfully requests that the Commission enter an order granting PSE leave to revise its prefiled direct evidence in this proceeding and accepting for filing revised testimony submitted with this motion.

DATED: October 24, 2011

Respectfully Submitted,

PERKINS COIE LLP

By: 
Sheree Strom Carson, WSBA #25349
Jason T. Kuzma, WSBA #31830
Donna L. Barnett, WSBA #36794
Attorneys for Puget Sound Energy, Inc.