

**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
SUPPLEMENTAL TESTIMONY AND
EXHIBIT

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the prefiled supplemental direct testimony and exhibit submitted with this motion. The purpose of this supplemental evidence is to update the Fourth Exhibit to the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit No. ___(JAP-5) to reflect the proposed inclusion of one additional customer on Schedule 40 that was not included on that rate schedule in PSE's initial rate filing. Along with this change, PSE has updated the Fourth Exhibit to the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit No. ___ (JAP-5), to reflect the revenue requirement presented in the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No.__(JHS-11T), which was filed on September 1, 2011.

2 PSE filed its prefiled direct evidence in this general rate case proceeding on June 13, 2013 and supplemental direct evidence on September 1, 2011. After filing its direct testimony

and exhibits, PSE became aware that one customer met the qualification standards for service under its electric rate Schedule 40 but had not been included in that rate schedule. This rate schedule is mandatory for all customers that qualify, and customers can only be added or removed from this schedule during a general rate case. Therefore, PSE is obligated to supplement its initial filing to reflect the qualification of this additional customer. Accordingly, PSE requests permission to file the following supplemental testimony and exhibits:

- Prefiled Supplemental Direct Testimony of Jon A. Piliaris, Exhibit No. ____ (JAP-22T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Jon A. Piliaris, Exhibit No. ____ (JAP-23);

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

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 because it will allow PSE to more accurately assign its customers to the appropriate rate schedule. As set forth in the Prefiled Supplemental Direct Testimony of Jon A. Piliaris, Exhibit No. ____ (JAP-22T), PSE only recently learned that this customer qualified for Schedule 40. The customer was not identified in the screening process used to locate customers eligible for service under PSE's electric rate Schedule 40 because several meter locations serving the customer were not coded to the correct distribution feeder in

PSE's customer information system. This change in rate schedules results in a very slight increase to the electric revenue requirement of approximately \$70,000.

5 PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand the changes that are required. Allowing these changes now will reduce the burden on PSE witnesses and other parties that would otherwise result from addressing these discrepancies in data request responses or rebuttal testimony. Submission of the supplemental evidence at this time provides the other parties ample opportunity to engage in discovery regarding the updated information prior to formulating their response testimony (due December 7, 2011). Therefore, the parties to this proceeding will not be disadvantaged by this filing.

6 The Commission has expressed the importance of having a full and accurate record upon which to base its decisions. In PSE's 2007 GRC, PSE was granted leave to file supplemental testimony. (*See* Order 08, dated May 5, 2008.) The Order stated:

The Commission's paramount interest is in having a full record with the best available evidence upon which to base its decisions. When the Company offers supplemental evidence, as here, the Commission balances its interest in having up-to-date information against the needs of the parties to have adequate opportunities for discovery and the development of their own testimony and exhibits....

Order 08 at ¶10. PSE believes that this request to supplement its filing will allow for "a more orderly process and will promote fairness." (*See id.* at ¶9)

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

DATED: November ^{9th}7, 2011

Respectfully Submitted,

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