

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UG-110723

PUGET SOUND ENERGY, INC.'S
MOTION TO AMEND PROCEDURAL
SCHEDULE

- I.* Puget Sound Energy, Inc. ("PSE") respectfully submits to the Washington Utilities and Transportation Commission ("Commission") this motion to amend the procedural schedule in the above-referenced docket. PSE files this motion in response to the Objection of Commission Staff ("Staff") to Prehearing Conference Order 02 ("Objection") and Commission Order 03 - Order Overruling Objections to Order 02 and Modifying Procedural Schedule ("Order 03").¹ PSE requests that the Commission slightly modify the procedural schedule to provide for a discovery response period of three business days, commencing on October 25, 2011.

¹ PSE interpreted Staff's Objection, as the Commission does, as a motion to modify the procedural schedule. Order 03 at ¶7. Accordingly, PSE was prepared to file a response within five business days of Staff's September 1, 2011 filing. Because the Commission has ruled on Staff's Objection, PSE instead files this motion to request that the Commission slightly modify the procedural schedule.

2. Staff requested that the Commission revise Order 02 to provide for an expedited discovery schedule commencing on November 8, 2011, the day PSE's rebuttal testimony is due, to reduce the data request response time from ten business days to two business days.² Staff stated that without an expedited discovery schedule, Staff and other parties would not receive data request responses prior to the scheduled hearing.³ The Commission granted Staff's request for expedited discovery, with one modification: all data requests seeking the shortened response time must be directed specifically to PSE's rebuttal testimony. PSE agrees with this modification for data requests served after PSE's rebuttal testimony is filed.
3. PSE does not object to an expedited discovery schedule, but PSE requests a response period of three business days rather than two. PSE also requests that the expedited schedule commence October 25, 2011, the day Staff, Public Counsel and intervenor response testimony and exhibits are due. A three-day response period will provide sufficient time for Staff and other parties to review data request responses prior to the hearing while allowing PSE time to review and process the data requests. Commencing the expedited schedule on October 25, 2011 allows PSE equivalent time to review data request responses prior to the date PSE's rebuttal testimony is due. Further, an expedited discovery schedule following response testimony is consistent with other Commission proceedings.⁴

² See *id.*, ¶4.

³ See *id.*

⁴ See, e.g., *In the Matter of PSE for an Order Authorizing the Use of Proceeds from the Sale of Renewable Energy Credits*, Docket UE-070725, Order 01, ¶7 (Dec. 4, 2009) (shortening response time to 5 days following Staff, Public Counsel and intervenor response testimony); see also *WUTC v. PSE*, Docket UG-101644, Order 03, ¶9 (Nov. 24, 2010) (shortening response time to 5 days following Staff, Public Counsel and intervenor response testimony); *WUTC v. PSE*, Dockets UE-090704/UG-090705 (consolidated) Order 04, ¶8 (June 24, 2009) (shortening response time to 5 days following Staff, Public

4. Accordingly, PSE agrees that a shortened response time to data requests is appropriate and requests a discovery response period of three business days, commencing on October 25, 2011.

DATED: September 7, 2011

Respectfully Submitted,

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Counsel and intervenor response testimony); and *In the Matter of the Joint App. of Puget Holdings and PSE For an Order Authorizing Proposed Transaction*, Docket U-072375, Order 01, ¶13 (Jan. 17, 2008) (shortening response time to 7 days following Staff, Public Counsel and intervenor response testimony).

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