BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| WASHINGTON UTILITIES AND |
|---------------------------|
| TRANSPORTATION COMMISSION |

Complainant,

v.

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PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET UE-072300 DOCKET UG-072301 (Consolidated)

DOCKET UG-080064

COMMISSION STAFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY AND EXHIBITS

Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), the Staff of the Washington Utilities and Transportation Commission requests permission to file the following supplemental testimony and exhibits submitted with this motion:

Exhibit No. __ T (WHW-6T), Supplemental Testimony of William H. Weinman

Exhibit No. __ (WHW-7), Electric Results of Operations and Revenue Requirement

Exhibit No. __ (WHW-8), Gas Results of Operations and Revenue Requirement

The Commission's procedural rules require Staff to seek permission to file this additional evidence because it includes substantive changes to Staff's original response case of May 30, 2008:

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). Staff, therefore, files this motion seeking such permission.

COMMISSION STAFF'S MOTION FOR LEAVE TO ILE SUPPLEMENTAL TESTIMONY AND EXHIBITS - 1

Staff's motion should be granted. The supplemental evidence explains a substantive change to Staff's original presentation that removes from the electric results of operations an adjustment for a diesel oil spill at Crystal Mountain in 2006. The supplemental evidence proposed by Staff also includes corrections to Staff's original presentation that would benefit from a more thorough explanation than only the filing of revised pages.¹

Allowing Staff to supplement its evidence now will also reduce the burden on the Company and other parties that may otherwise have to address these changes and corrections in their rebuttal and cross-answering testimony due July 3, 2008.

Finally, Staff has notified all other parties of its intent to file its supplemental testimony and exhibits. No party has objected to that filing.

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

DATED this 25th day of June, 2008.

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Respectfully submitted,

ROBERT M. MCKENNA Attorney General

ROBERT D. CEDARBAUM

Senior Counsel

Counsel for Washington Utilities and

Transportation Commission

¹ Simultaneously with this motion, Staff is also filing revised pages to the testimony of Michael Parvinen, Thomas Schooley and Roland Martin, as well as revised Exhibit Nos. __ (TES-5) and __ (TES-6) of Mr. Schooley. These revisions merely reflect the changes included in Mr. Weinman's supplemental testimony and exhibits. Therefore, they have been filed under WAC 480-07-460(1)(b)(iv) without supporting testimony.