

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

v.

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-220066  
Docket UG-220067**

**PUGET SOUND ENERGY'S MOTION  
FOR LEAVE TO FILE REVISED  
TESTIMONY**

1. Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(a)(i), Puget Sound Energy, Inc. ("PSE") hereby requests that the Commission grant it leave to file the revised direct testimony submitted with this motion. The purpose of the revision is to correct certain substantive errors relating to PSE's deferral amounts. PSE provides its proposed revisions with this motion.
2. The Commission's procedural rules require PSE to seek leave for filing its proposed revisions because they represent a substantive change:

Parties must seek leave from the presiding officer by written motion if they wish to file revised prefiled testimony or exhibits that include substantive changes. A party proposing such changes may submit the proposed revisions with its motion.


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

3. After PSE prefiled direct testimony in this general rate case on January 31, 2022, PSE discovered inadvertent errors requiring correction while responding to Public Counsel’s data requests. Specifically, PSE discovered Table 1 from the Prefiled Direct Testimony of Kazi H. Hasan, Exh. KKH-1CT, incorrectly stated certain amounts deferred from 2017-2021. PSE also discovered Figure 2 from Exh. KKH-1CT did not correctly portray PSE’s earned return on equity.
4. Although the amounts incorrectly stated are relatively minor errors, and they do not have flow-through impacts that change the overall revenue requirement, the changes to Exh. KKH-1CT should be updated to accurately reflect PSE’s data in this case. Allowing PSE to submit the revised testimony will correct the record in a timely fashion and in compliance with Commission rules.
5. PSE specifically will update Exh KKH-1CT, Table 1 on page 36-37 to correct the 1) Power Cost- Customer Portion to agree with balances in PSE’s annual Power Cost Adjustment compliance filings, 2) Electric Vehicle and Environmental amounts to be annual balances instead of year-over-year changes, 3) GTZ, AMI and LNG rows to remove amounts that are earning PSE’s authorized rate of return or are the deferrals of return or carrying charges, and 4) Power Cost- PSE Portion balances to be in its own section of the table because the balances for this category are not subject to recovery and therefore deserve separate recognition from all others.
6. Accordingly, PSE would like to submit the following revised evidence in this proceeding:  
Revised Prefiled Direct Testimony of Kazi H. Hasan, 220066-PSE-Exh. KKH-1CTr-03-15-22, submitted with this motion.

7. PSE is also filing minor corrections to the Prefiled Direct Testimony of Catherine A. Koch, Exh.CAK-1T, and certain exhibits of PSE witness Dan'l R. Koch (Exh. DRK-3, Exh. DRK-4, Exh. DRK-5, Exh. DRK6, Exh. DRK-23, and Exh. DRK-25). PSE is not requesting leave to make those changes because those revisions are minor and non-substantive. *See* WAC 480-07-460(1)(a)(ii). The revisions to Koch, Exh. CAK-1T, fix non-substantive typos and are in redline. The revisions to the exhibits of Dan'l R. Koch simply clarify the designations of certain exhibits but make no changes to the content.
8. PSE's motion should be granted. PSE seeks to make minor, yet substantive revisions to the general rate case filing, and PSE has sought to prepare and present its revised evidence in a manner that makes it easy for other parties to understand the changes that are required. *See* WAC 480-07-460(1)(a)(iii). The revisions to the testimony are shown in legislative style, with strikeouts and in red to indicate changes, as provided in WAC 480-07-460(1)(a)(iii).
9. Allowing these changes now, at this early stage in the proceeding, will reduce the burden on PSE witnesses, other parties, and the Commissioners, that would otherwise result from addressing these discrepancies in response and rebuttal testimony. PSE has notified all parties of this change in response to data requests, and PSE is filing this motion more than four months before the other parties' response testimony is due in this proceeding.
10. For the reasons set forth above, PSE respectfully requests that the Commission enter an order granting PSE leave to revise its prefiled evidence in this proceeding and accepting for filing the revised direct testimony submitted with this motion.

RESPECTFULLY SUBMITTED this 15th day of March, 2022.

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