

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE- 240004
Docket UG- 240005**

**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 (“PSE”) hereby requests that the Commission grant it leave to file the revised exhibit submitted with this motion. The purpose of the revision is to correct an inadvertent omission relating to PSE’s Bainbridge Island project. PSE included various Corporate Spending Authorizations (“CSA”) related to and supporting the Bainbridge Island project in the exhibits supporting its prefiled direct testimony but inadvertently omitted a relevant CSA for the Winslow Tap transmission line. PSE provides its proposed revisions with this motion.
2. Although the addition of the omitted CSA does not substantively change the testimony of Roque B. Bamba, PSE files this motion seeking leave out of an abundance of caution. The

Commission's procedural rules may require PSE to seek leave for filing its proposed revisions pursuant to WAC 480-07-460(1)(a)(i).

3. After PSE filed prefiled direct testimony on February 16, 2024, PSE discovered inadvertent errors requiring correction while responding to Commission Staff's data requests. Specifically, PSE discovered a CSA for the Winslow Tap transmission line was missing from the Third Exhibit to the Prefiled Direct Testimony of Roque B. Bamba, Exh. RBB-4.

4. The omitted CSA is a relatively minor error, but the CSA should be included in Exh. RBB-4 for completeness. Allowing PSE to submit the revised exhibit will correct the record in a timely fashion and in compliance with Commission rules. PSE specifically will update Exh. RBB-4 by adding the Winslow Tap CSA, included in the revised version on pages 13-17.

5. Accordingly, PSE would like to submit the following revised evidence in this proceeding: Revised Third Exhibit to the Prefiled Direct Testimony of Roque B. Bamba, Exh. RBB-4, submitted with this motion.

6. PSE is also filing minor corrections to the Prefiled Direct Testimony of Matt Steuerwalt, Exh. MS-1Tr, and replacement versions of the Prefiled Direct Testimony of Ned W. Allis, Exh. NWA-1T, and the Confidential version of the Seventh Exhibit to the Prefiled Direct Testimony of Colin P. Crowley Exh. CPC-8HC. PSE is not requesting leave to make those changes because the revisions are minor and non-substantive while the replacement versions update the cover page and header. *See* WAC 480-07-460(1)(a)(ii). The revisions to Steuerwalt, Exh. MS-1Tr, fix minor non-substantive typos on pages 47-48. The replacement to Allis, Exh. NWA-1T, fixes

non-substantive typos on the cover page. Finally, the replacement to the Confidential version of Crowley, Exh. CPC-8HC, fixes non-substantive typos on the header.

7. PSE’s motion should be granted. PSE seeks to make minor 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 exhibit are clearly indicated with new pages labeled as “REVISED,” as provided in WAC 480-07-460(1)(a)(iii).
8. 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 the change to Exh. RBB-4 in response to data requests, and PSE is filing this motion months before the other parties’ response testimony is due in this proceeding.
9. 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 exhibit submitted with this motion.

RESPECTFULLY SUBMITTED this 10th day of April, 2024.

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