

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKETS UE-090704
and UG-090705 (consolidated)

COMMISSION STAFF MOTION
FOR LEAVE TO FILE REVISED
TESTIMONY AND EXHIBITS,
AND EXPLANATORY
SUPPLEMENTAL RESPONSE
TESTIMONY

I. INTRODUCTION

1 Pursuant to WAC 480-07-375(1)(d) and WAC 480-07-460(1)(b)(ii), the Staff of the Washington Utilities and Transportation Commission hereby requests that the Commission grant it leave to file the supplemental response testimony of Mr. Danny P. Kermode, submitted with this motion as Exhibit No. DPK-4T. The purpose of the supplemental response testimony is to explain a revision to the Staff presentation of investor-supplied working capital. That revised presentation requires revisions to the exhibits of Mr. Kermode, and the response testimony and exhibits of Mr. Roland C. Martin, all of which are also submitted with this motion.¹

II. DISCUSSION IN SUPPORT OF MOTION

2 Staff filed its response evidence in this general rate proceeding on November 17, 2009. Staff's presentation included in Adjustments 9.13G and 10.19E the impact on investor-supplied working capital of Mr. Martin's recommendation to treat electric and gas customer deposits as direct offsets to rate base. Discovery requests regarding this

¹ Simultaneously with this motion, Staff is separately filing revisions to the testimony and exhibits of Staff witnesses Parvinen, Breda, Foisy, LaRue, and Parcell. These revisions only correct errors in calculations. Therefore, their filing does not require express Commission permission. WAC 480-07-460(1)(b)(i).

recommendation led Staff to conclude that it is more appropriate to reflect the investor-supplied working capital impacts of Mr. Martin's recommendation in the Company's unadjusted Actual Results of Operations, along with all other recommendations proposed by Mr. Kermode on investor-supplied working capital. Combining the impacts of all Staff investor-supplied working capital recommendations corrects minor calculation errors. It also makes the Staff presentation consistent with the presentation of the Company on investor-supplied working capital.

3 In order to reflect and explain this change in presentation, it is necessary to file and/or revise the following testimony and exhibits:

- Prefiled Supplemental Response Testimony of Danny P. Kermode, Exhibit No. DPK-4T;
- Exhibit No. DPK-2 to the Response Testimony of Danny P. Kermode;
- Exhibit No. DPK-3 to the Response Testimony of Danny P. Kermode;
- Prefiled Response Testimony of Roland C. Martin, Exhibit No. RCM-1T at pages ii, 2, 4, 5, 8 and 9;
- Exhibit No. RCM-2 to the Prefiled Response Testimony of Roland C. Martin (Please note that this exhibit was filed originally as Exhibit No. RCM-3. It has been renumbered as Exhibit No. RCM-2. The original Exhibit No. RCM-2 is hereby withdrawn.)

4 The Commission's procedural rules require Staff to seek leave to file its proposed revisions, as explained by Mr. Kermode's supplemental response testimony, because the revisions do more than correct errors in calculations:

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 leave.

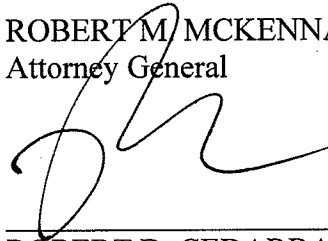
5 Staff's motion should be granted. The proposed supplemental response testimony and revisions have a minor impact on Staff's overall revenue requirement recommendations in this general rate case. Moreover, the evidence will align the Staff presentation on investor-supplied working capital with the Company's presentation on that same topic. Such alignment will benefit the Commission in its review and analysis of investor-supplied working capital issues. Finally, the Company has been advised of Staff's intent to propose these revisions and, therefore, it should not be hampered in its ability in rebuttal testimony to respond to the revised Staff presentation.

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

DATED this 11th day of December, 2009.

Respectfully submitted,

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Transportation Commission Staff