**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  Puget Sound EnergyPUGET SOUND ENERGY,  PSE  Respondent. | No. UE-151871 and UG-151872 (Consolidated)  **PUGET SOUND ENERGY’S MOTION FOR LEAVE TO FILE A REPLY TO PUBLIC COUNSEL’S RESPONSE IN SUPPORT OF COMMISSION STAFF’S MOTION FOR SUMMARY DETERMINATION** |

1. Pursuant to WAC 480-07-370(d) and WAC 480-07-375, Puget Sound Energy (“PSE”) respectfully requests leave to file a reply to Public Counsel’s response in support of Commission Staff’s (“Staff”) Motion for Summary Determination (“Motion”). Because Public Counsel’s response misstates the law and misrepresents the terms of PSE’s proposed lease service, PSE requests leave to file a reply to Public Counsel’s response. PSE provides its proposed reply with this motion.
2. On July 13, 2016, Staff filed its Motion. On July 14, 2016, the Commission ordered that the parties may file a response to Staff’s Motion by July 22, 2016. On July 22, 2016, Public Counsel filed its response in support of Staff’s Motion. On July 25, 2016, the Commission issued notice that it would likely not rule on Staff’s Motion in advance of the hearing scheduled on August 1, 2016.
3. Good cause supports leave for PSE to file a reply. Public Counsel’s response supported Staff’s Motion and contained additional arguments in support of Staff’s Motion, including the citation of new alleged authorities. In effect, it amounted to a second motion for summary determination against PSE. Given that Staff’s Motion is a dispositive motion, it would be inequitable for PSE to not have the opportunity to respond to additional arguments advanced in support of Staff’s Motion. This is particularly true since PSE believes that Public Counsel has misstated the law and misrepresented the terms of PSE’s proposed lease service.
4. For the reasons set forth above, PSE respectfully requests leave to file a reply in response to Public Counsel’s arguments. A proposed reply is attached to this motion.

Respectfully submitted this 29th day of July, 2016.

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|  | **Perkins Coie LLP**  By:  Sheree S. Carson, WSBA No. 25349  David S. Steele, WSBA No. 45640  The PSE Building  10885 N.E. Fourth Street, Suite 700  Bellevue, WA 98004-5579  Telephone: 425.635.1400  Facsimile: 425.635.2400  Email: SCarson@perkinscoie.com  Email: DSteele@perkinscoie.com  *Attorneys for Puget Sound Energy* |