

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-090704

Docket No. UG-090705

PUGET SOUND ENERGY, INC.'S  
RESPONSE TO WUTC STAFF MOTION  
FOR LEAVE TO FILE REVISED  
TESTIMONY AND EXHIBITS AND  
EXPLANATORY SUPPLEMENTAL  
RESPONSE TESTIMONY

1 On December 11, 2009, the Staff of the Washington Utilities and Transportation Commission (“Commission Staff”) filed a motion requesting leave to file 1) supplemental testimony of Danny P. Kermode, 2) revised exhibits of Mr. Kermode, and 3) revised testimony and exhibits of Roland C. Martin. At the same time it filed its motion, Commission Staff also filed revised testimony and exhibits of Commission Staff witnesses Parvinen, Breda, Foisy, LaRue, and Parcell.<sup>1</sup> Commission Staff states that the purpose of its supplemental testimony is to explain a revision to its presentation of

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<sup>1</sup> Commission Staff states that it did not include such revised testimony and exhibits in its motion because such evidence only corrects errors in calculations and therefore, “does not require express Commission permission”. Commission Staff’s Motion, note 1.

investor-supplied working capital. Commission Staff states that Mr. Kermode's exhibits and Mr. Martin's testimony and exhibits must be revised to reflect the revised presentation. Puget Sound Energy, Inc. ("PSE") submits this response to Staff's motion.

2 Commission Staff has filed sixteen pieces of supplemental or revised evidence less than one week before PSE's rebuttal testimony is due. PSE had a very limited window of time to prepare its rebuttal testimony even before Commission Staff filed this supplemental and revised testimony. PSE does not have adequate time to review and verify Staff's revised and supplemental filing and to incorporate Commission Staff's revisions into PSE's rebuttal filing that is due December 17, 2009.

3 PSE does not object to Commission Staff's motion to file supplemental evidence with the following caveats. PSE reserves the right to object to the admission into evidence of all supplemental and revised evidence, including an objection if the evidence goes beyond the mere correction of errors and, instead, constitutes improper updates or injects new issues that PSE could not reasonably and fairly evaluate under the current procedural schedule. PSE further reserves the right to supplement its rebuttal testimony, if needed, after PSE has had adequate time to review Commission Staff's supplemental filing.

DATED this 14th day of December, 2009.

Respectfully Submitted,

**PERKINS COIE LLP**

A handwritten signature in blue ink that reads "Sheree S. Carson". The signature is written in a cursive style and is positioned above a horizontal line.

Sheree S. Carson, WSBA #25349

Donna L. Barnett, WSBA #36794

Attorneys for Puget Sound Energy, Inc.

PSE's RESPONSE TO WUTC STAFF  
MOTION FOR LEAVE TO FILE  
REVISED TESTIMONY AND EXHIBITS  
AND EXPLANATORY SUPPLEMENTAL  
RESPONSE TESTIMONY