

**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 AND EXHIBITS**

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 direct testimony and exhibits submitted with this motion. The purpose of the revision is to correct an oversight regarding PSE's Energy Charge. 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. During settlement negotiations in this proceeding, it came to PSE's attention that its initial filing neglected to assign costs to offset the credit provided to Schedule 139 customers for

the energy-related power cost component of PSE's Voluntary Long Term Renewable Energy Purchase Rider ("Green Direct") energy charge ("Energy Charge"). Accordingly, PSE submits revised testimony and exhibits to correct this oversight and apply such offset in the form of a Schedule 141A Energy Charge Credit Recovery Adjustment.

4. Although the revised filing is a relatively minor correction and does not impact PSE's revenue requirement, the changes are substantive and should be made to account for cost recovery of the proposed Energy Charge Credit. Allowing PSE to submit the revised testimony will correct the record in a timely fashion, before response testimony is due, and in compliance with Commission rules.
5. PSE will revise pages of Exh BDJ-1T and Exh. SEF-1T to present the offsetting surcharge in Schedule 141A and to describe the impact of the surcharge on customer bills. PSE will also update exhibits supporting the testimony, including Exh. BDJ-19r, which contains the tariff sheets for the proposed Schedule 141A.
6. Accordingly, PSE would like to submit the following revised evidence in this proceeding submitted with this motion:
 1. Prefiled Direct Testimony of Birud D. Jhaveri, 220066-PSE-Exh. BDJ-1Tr-06-27-22,
 2. Exh. BDJ-5r, 220066-PSE-Exh. BDJ-5r-06-27-22,
 3. Exh. BDJ-6r, 220066-PSE-Exh. BDJ-6r-06-27-22,
 4. Exh. BDJ-7r, 220066-PSE-Exh. BDJ-7r-06-27-22,
 5. Exh. BDJ-18r, 220066-PSE-Exh. BDJ-18r-06-27-22,
 6. Exh. BDJ-19r, 220066-PSE-Exh. BDJ-19r-06-27-22


7. Prefiled Direct Testimony of Susan E. Free, 220066-PSE-Exh. SEF-1Tr-06-27-22,
8. Exh. SEF-3r, 220066-PSE-Exh. SEF-3r-06-27-22, and
9. Exh. SEF-4r, 220066-PSE-Exh. SEF-4r-06-27-22,

PSE is also serving all parties with workpapers supporting these revisions.

7. PSE's motion should be granted. While PSE could file a stand-alone tariff to account for the credit, such a filing would be administratively inefficient. As it stands now, there is no mechanism for offsetting PSE's Energy Charge credits for its proposed Green Direct customers, creating a mismatch in PSE's rate design and uncertainty regarding the mechanism for cost recovery. PSE seeks to correct this relatively minor, yet substantive oversight 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). Revisions to data in spreadsheets are indicated by blue and italicized text.
8. Allowing these changes now, while parties have the opportunity to review prior to filing response testimony, will reduce the burden on PSE witnesses, other parties, and the Commissioners, that would otherwise result from addressing the oversight in response and rebuttal testimony.
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 direct testimony and exhibits submitted with this motion.

RESPECTFULLY SUBMITTED this 27th day of June, 2022.

PERKINS COIE LLP

By 
Donna L. Barnett, WSBA #36794
Sheree Strom Carson, WSBA #25349
Pamela J. Anderson, WSBA #37272
David S. Steele, WSBA #45640
Byron C. Starkey, WSBA #55545
Attorneys for Puget Sound Energy