

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION
COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKETS UE-111048
and UG-111049 (*consolidated*)

MOTION OF PUBLIC COUNSEL
FOR LEAVE TO DISTRIBUTE
ADDITIONAL CROSS
EXAMINATION EXHIBITS

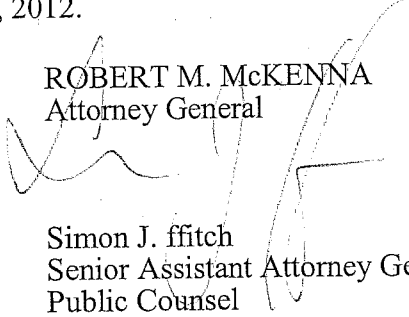
1. Pursuant to WAC 480-07-375 and WAC 480-07-385, the Public Counsel Division of the Washington Attorney General's Office (Public Counsel) hereby moves the Washington Utilities and Transportation Commission (Commission) for leave to distribute a limited number of additional cross-examination exhibits on February 10, 2012, one day after the February 9, 2012, deadline set in Order 03.
2. Public Counsel believes there is a good cause for a short extension of time. Public Counsel received responses from PSE to Data Requests Nos. 509-529 at approximately 6:40 p.m. on the evening of February 8, 2012. The responses were due on February 8. There was not sufficient time for Public Counsel to review the responses, select cross-exhibits, and produce them for distribution by close of business on February 9. Public Counsel has now been able to complete its review of the material provided and is, concurrently with this motion, providing a

set of additional proposed cross exhibits for Ms. Seelig, Mr. Garratt, Mr. Stolarski and Mr. Piliaris to the Bench and to the parties, pending a ruling on this motion.

3. In addition, PSE has advised Public Counsel that one of the Data Requests (No. 523) due February 8 will not be fully answered until Friday, February 10, two days after the due date. The response (on disk) may contain a significant amount of material. Public Counsel respectfully requests until Monday, if necessary to designate an added exhibit based on this late-received response.

4. Public Counsel, therefore, believes that the foregoing establishes good cause for its motion, and respectfully requests leave be granted to distribute the added cross exhibits. Public Counsel is aware of no material prejudice to PSE that will result from this short extension. All of the material in the exhibits was produced by and is known to PSE. Public Counsel has acted promptly in this matter and is hopeful that the short extensions requested will therefore not unduly inconvenience the Bench.

5. DATED this 10th day of February, 2012.


ROBERT M. McKENNA
Attorney General

Simon J. ffitch
Senior Assistant Attorney General
Public Counsel