

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-240004, UG-240005,
UE-230810 (*Consolidated*)

COMMISSION STAFF'S MOTION
FOR LEAVE TO FILE REVISED
EXHIBITS

I. INTRODUCTION

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(a)(1)(i), Commission Staff respectfully requests leave to revise the following prefiled exhibits originally filed on August 6, 2024: JDW-18, JDW-19, JDW-20, and JDW-22.

II. FACTUAL BACKGROUND

2 PSE filed with the Utilities and Transportation Commission (Commission) its general rate case on February 15, 2024, requesting rate increases for both electric and natural gas service. The Commission suspended the filings for adjudication and consolidated the electric request with the natural gas request.¹ The Commission adopted a procedural schedule which required Staff and other responding parties to file response testimony by August 6, 2024.²

3 Shortly before filing testimony Staff realized that four exhibits relied upon by Staff witness John Wilson were data responses filed by PSE in Docket UE-230313, and that Staff should have issued these same data requests to PSE in this general rate case docket. The exhibits

¹ *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy*, Dockets UE-240004 & UG-240005 (consolidated), Order 01 Complaint and Order Suspending Tariff Revisions; Order of Consolidation, ¶¶ 1-7 (March 5, 2024).

² *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy*, Dockets UE-240004 & UG-240005 (consolidated), Order 04/02, Prehearing Conference Order, ¶ 10 and Appendix B (April 18, 2024).

at issue are JDW-18C, JDW-19, JDW-20 and JDW-22. Unfortunately, this realization occurred too late to issue these data requests in the general rate case docket, receive responses from PSE, and incorporate the responses into John Wilson’s response testimony. After filing response testimony, Staff issued data requests to PSE seeking the same information (with any updates, if applicable) that it requested JDW-18C, JDW-19, JDW-20, and JDW-22 and received responses. Staff is now moving to revise JDW-18C, JDW-19, JDW-20 and JDW-22 by substituting PSE’s data responses provided in UE-230313 with PSE’s data responses it provided this general rate case docket.

4 The following table illustrates the revisions Staff is requesting to John Wilson’s exhibits:

Prefiled Exhibits	Revised Exhibits
JDW-18C (PSE Response to Staff DR No. 27, UE-230313)	JDW-18Cr (PSE Response to Staff DR No. 225)
JDW-19 (PSE Response to Staff DR No. 28, UE-230313)	JDW-19r (PSE Response to Staff DR No. 226)
JDW-20 (PSE Response to Staff DR No. 29, UE-230313)	JDW-20r (PSE Response to Staff DR No. 227)
JDW-22 (PSE Response to Staff DR No. 30, UE-230313)	JDW-22r (PSE Response to Staff DR No. 228)

III. COMMISSION STAFF’S MOTION

15 Under WAC 480-07-460(1)(a)(i), a party may submit substantive revisions to prefiled testimony or exhibits only after receiving leave from the presiding officer. WAC 480-07-460(1)(b) requires that a party file with the Commission and serve all other parties with a motion to make substantive changes to any prefiled exhibits as soon as practicable after discovering the need to make that change. In considering such motions, the Commission has generally examined

the timing of such motions, the prejudice to any other parties, and whether granting such motions will disrupt the procedural schedule of the case.³

16 Leave to amend is warranted here. Staff's revised exhibits contain substantive changes in that they substitute PSE's data response from Docket UE-230313 with PSE's data responses provided in these dockets. However, the data requests within the revised exhibits seek the same information as the data requests in the original exhibits, with any applicable updates. PSE's responses contained in the revised exhibits provided the same information, with three of the revised exhibits also including minor updates or typographical corrections.⁴ Nothing in the revised exhibits changes or alters any of Staff's conclusions or opinions.

17 Staff filed this motion to revise exhibits as soon as practicable after discovering the error with minor delay resulting from the process of issuing new data requests and receiving responses. There is no prejudice to any party as a result of the filing of these revised exhibits. The revised exhibits contain substantially the same information as the original prefiled exhibits, and Staff brings this motion before cross-answering and rebuttal testimony are due in this case. This filing does not affect the procedural schedule because Staff is not requesting any shifting of deadlines.

IV. CONCLUSION

18 For the reasons listed above, Staff respectfully requests that the Commission grant its motion for leave to file the Revised Exhibits and have such exhibits be treated in the same manner of as the rest of Staff's prefiled exhibits in this proceeding.

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³ *Id.* at ¶ 7.

⁴ The three revised exhibits with minor updates or typographical changes are JDW-18C-20r.

DATED this 16th day of September 2024.

/s/ Cassandra Jones WSBA No. 42216
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