

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

In the Matter of the Petition of,

PUGET SOUND ENERGY

Petitioner,

**For an Accounting Order Authorizing
deferred accounting treatment of
purchased power agreement expenses
pursuant to RCW 80.28.410**

**Docket UE-240004 and Docket UG-
240005 (*consolidated*)**

Docket UE-230810

**PUGET SOUND ENERGY’S MOTION
FOR LEAVE TO FILE REVISED
TESTIMONY**

- 1.* Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(a)(i), Puget Sound Energy (“PSE”) requests that the Commission grant it leave to file revised rebuttal testimony for PSE witness Jamie L. Martin, Exh. JLM-1CT. Martin filed rebuttal testimony in this case on September 18, 2024. The purpose of this revised testimony is to make minor changes to Martin’s rebuttal testimony that clarify her testimony regarding construction work in progress (“CWIP”)

and interest expense regulatory drag. Upon further review, Martin's rebuttal testimony on these issues commingled those amounts into a single variance, which obscured the impact of each that could be confusing. To correct this, PSE submits the proposed revised testimony with this motion.

2. The Commission's procedural rules require PSE to seek leave when filing proposed revisions if the revisions 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.¹

3. When evaluating a motion for leave to file revised testimony, the Commission generally considers the timing of the motion, the prejudice to other parties, and whether accepting revised testimony would disrupt the procedural schedule.²

4. Leave is warranted in this case. As explained above, upon further review of Martin's rebuttal testimony, PSE determined only days after filing that the testimony regarding CWIP and interest expense regulatory drag obscured the impact of each that could be confusing to case parties and the Commission. Upon discovery of this, PSE quickly filed this motion.

5. PSE's filing of revised testimony will not prejudice case parties because there is still time for the parties to conduct discovery on these issues, if necessary, and it will have no impact on

¹ WAC 480-07-460(1)(a)(i).

² WAC 480-07-460(1)(b); *Wash. Utils. & Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-210755, Order 04 ¶ 6 (Dec. 17, 2021).

the procedural schedule. Instead, accepting Martin’s revised rebuttal testimony will clarify the issues for case parties and the Commission, making PSE’s position clearer and more transparent.

6. For these reasons, PSE respectfully requests that the Commission enter an order granting PSE leave to file revised rebuttal testimony for Jamie L. Martin and accepting for filing the revised rebuttal testimony submitted with this motion.

RESPECTFULLY SUBMITTED this 26th day of September, 2024.

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