

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-240004 and UG-230005  
(Consolidated)

**JOINT ENVIRONMENTAL  
ADVOCATE’S MOTION FOR LEAVE  
TO FILE REVISED TESTIMONY**

1. Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(a)(i), Joint Environmental Advocates (“JEA”) hereby requests that the Commission grant it leave to file the revised Cross Answering Testimony of William Gehrke submitted with this motion. The purpose of the revision is to remove four questions in Mr. Gehrke’s cross-answering testimony concerning the Clean Generation Tracker.
2. In his original cross-answering testimony, Mr. Gehrke indicated that deferral balances accumulate until being amortized in a future rate case. Upon further review, JEA determined that the cross-answering testimony may not have fully captured the nuances of how the multiyear rate plan and CETA deferrals interact and hence were incomplete. Consequently, JEA decided to remove the incomplete answers from his testimony altogether.
3. Mr. Gehrke became aware of this issue after reviewing the cross-answering testimony of other parties.

4. Accordingly, JEA submits the following revised testimony in this proceeding:  
Revised Cross Answering Testimony of William Gehrke, submitted with this motion.  
The revisions remove the following four questions on pages 16 through 17 of his  
original testimony, together with the responses.

**Q. *What cost recovery tools does CETA provide to PSE?***

**Q. *Has PSE used the deferrals to track costs associated with CETA?***

**Q. *What issues do deferrals present to customers?***

**Q. *How do you expect PSE to respond if it does not approval for the CGR  
tracker?***

5. JEA's motion should be granted. JEA seeks to make a modest revision to its  
general rate case filing, and JEA has sought to 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 exhibit are clearly  
indicated with new pages labeled as "REVISED," as provided in WAC 480-07-  
460(1)(a)(iii). The removed portions of the text are marked with [Material Deleted]  
in the revised testimony.

6. Allowing these changes now, prior to the hearing, will reduce the burden on  
JEA witnesses, other parties, and the Commissioners, that would otherwise result from  
addressing these issues during the hearing. JEA has notified all parties of the change.

7. For the reasons set forth above, JEA respectfully requests that the Commission  
enter an order granting JEA leave to revise its Cross Answering Testimony of William  
Gehrke in this proceeding submitted with this motion.

Dated this 18th day of October, 2024.

Respectfully submitted,

/s/ Jan Hasselman

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