

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230968

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

- I.* 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-1T. Martin filed rebuttal testimony in this case on September 12, 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. PSE submits the proposed revised testimony with this motion. Martin’s rebuttal testimony has also been revised to mark confidentiality.

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 issue, PSE quickly filed this motion.

5. PSE’s filing of revised testimony will not prejudice case parties because the revised testimony will remove potential confusion and it will have no impact on the procedural schedule. Instead, accepting Martin’s revised rebuttal testimony will clarify the issue for case parties and the Commission, making PSE’s position clearer and more transparent.

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.

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).

RESPECTFULLY SUBMITTED this 26th day of September, 2024.

PERKINS COIE LLP

By s/Donna L. Barnett
Donna L. Barnett, WSBA #36794

Attorneys for Puget Sound Energy