

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

<p>WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,</p> <p style="text-align: center;">Complainant,</p> <p>v.</p> <p>PUGET SOUND ENERGY, INC.,</p> <p style="text-align: center;">Respondent.</p>	<p>Docket No. UG-040640</p> <p>Docket No. UE-040641</p> <p>PUGET SOUND ENERGY, INC.'S MOTION FOR LEAVE TO FILE REVISED AND SUPPLEMENTAL TESTIMONY</p>
<p>In the Matter of the Petition of</p> <p>PUGET SOUND ENERGY, INC.,</p> <p>For an Order Regarding the Accounting Treatment For Certain Costs of the Company's Power Cost Only Rate Filing</p>	<p>Docket No. UE-031471</p>
<p>In the Matter of the Petition of</p> <p>PUGET SOUND ENERGY, INC.,</p> <p>For an Accounting Order Authorizing Deferral and Recovery of Investment and Costs Related to the White River Hydroelectric Project</p>	<p>Docket No. UE-032043</p>

I Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the revised and supplemental prefiled testimony and exhibits submitted with this motion. The

PSE's MOTION FOR LEAVE
TO FILE REVISED AND
SUPPLEMENTAL TESTIMONY

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purpose of these revisions is to update PSE's prefiled evidence in this proceeding consistent with the Commission's Order No. 14 in Docket No. UE-031725 dated May 13, 2004, in PSE's power cost only rate case ("PCORC Order").

2 PSE filed its prefiled evidence in this general rate case proceeding on April 5, 2004. At the time, the Commission had not yet issued a decision in the PCORC proceeding. PSE assumed for purposes of its general rate case calculations and prefiled testimony that the Commission would accept PSE's proposed power cost base rate as revised in PSE's rebuttal testimony in the PCORC proceeding. PSE also assumed that it would collect revenues during the PCORC rate year based on the proposed PCORC power cost base rate and requested rate increase.

3 On May 13, 2004, the Commission issued its PCORC Order. Among other things, the PCORC Order reduced PSE's proposed power cost base rate because of a projected disallowance of half of the return on the Tenaska regulatory asset during the PCORC rate year. The PCORC Order will also result in PSE collecting lower revenues than it had anticipated. Aspects of the PCORC Order that are relevant to PSE's general rate case filing are described more fully in the Supplemental Testimony of John H. Story and James A. Heidell, submitted with this motion. In order to flow these changes through to its general rate case, PSE would like to revise and supplement its prefiled evidence in this proceeding by filing the testimony and exhibits submitted with this motion. In addition, Ms. Ryan seeks to file several revised pages to her testimony and exhibits to reflect the power costs approved in Order No. 14.

4 The Commission's new procedural rules appear to require PSE to seek leave for filing its proposed revisions because they go beyond revisions to correct mistakes:

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Parties must seek leave from the presiding officer by written motion if they wish to submit testimony that includes substantive changes other than to simply correct errors of fact asserted by a witness. A party proposing such changes may submit the proposed revisions with its motion.

WAC 480-07-460(1)(b)(ii). PSE therefore files this motion seeking such leave.

5 PSE's motion should be granted. PSE understands from its participation in the rulemaking giving rise to the new procedural rules that the primary purpose of the new rule requiring leave was to address potential prejudice to other parties caused by a party making last-minute, substantive changes to prefiled evidence on the eve of a hearing. In the present case, other parties have four months until the deadline for prefilings their response testimony. Discovery has barely commenced. Moreover, all parties have been anticipating that PSE would file revisions to its prefiled evidence to comport with the Commission's PCORC Order, as discussed at the prehearing conference in this case on May 17, 2004.¹

6 In addition, the PCORC Order results in relatively minor revisions to the general rate case filing, and PSE has sought to prepare and present its revised evidence in a manner that makes it easy for other parties to understand the changes that are required due to the PCORC Order. For example, PSE proposes to file Supplemental (rather than revised) Testimony of John H. Story to walk parties through the impact of the PCORC Order on the general rate case filing in order to place in context and explain the revisions PSE is making to the original testimony and exhibits filed on April 5, 2004.

¹ While PSE initially suggested at the prehearing conference that it file its PCORC-related revisions after the Commission's issuance of any order on reconsideration or clarification in the PCORC proceeding, other parties encouraged the Company to instead file revisions based on Order No. 14 within two weeks of the prehearing conference. Additional revisions may be needed in the event Order No. 14 is subsequently revised or clarified.

7 For the reasons set forth above, PSE respectfully requests that the Commission enter an order granting it leave to revise its prefiled evidence in this proceeding and accepting for filing the revised and supplemental testimony and exhibits submitted with this motion.

DATED: June ____, 2004

Respectfully Submitted,

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