

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket TP-220513

**RESPONDENT PUGET SOUND
PILOTS' MOTION FOR LEAVE TO
SUPPLEMENT THE RECORD**

MOTION

1. Pursuant to WAC 480-07-375 and the Commission's July 15, 2022, Complaint and Order Suspending Tariff Revisions ("Order 1"), Puget Sound Pilots ("PSP") move for leave to supplement the record by filing the Supplemental Testimony of Weldon T. Burton that is attached hereto as Exhibit A. In support of this motion, PSP relies on the record previously filed herein and the following points and authorities.

MEMORANDUM

2. On June 29, Puget Sound Pilots filed its second General Rate Case supported by more than 500 pages of testimony from 22 witnesses and more than 120 exhibits. PSP's evidence in support of its General Rate Case includes the Testimony of Weldon T. Burton, which primarily addresses the financial results of PSP for calendar year 2021 in a regulatory accounting format based upon PSP's audited financial statements for that year.¹

¹ Exh. WTB-01T.

3. On July 15, 2022, the Commission entered Order 01 suspending the tariff. Order 01 prohibits PSP from changing its filing without permission of the Commission.
4. Pursuant to Order 01, PSP requests leave to file the attached Supplemental Testimony of Weldon T. Burton, including the associated exhibit. Mr. Burton's supplemental testimony provides significant additional information regarding PSP's financial accounting and includes a description and explanation of PSP's 2021 pro forma statement of operations, including restating adjustments and pro forma adjustments. This supplemental testimony will assist the Commission and the parties by providing a highly detailed account of PSP's financial performance and operating costs.

CONCLUSION

5. Leave to file the attached Supplemental Testimony of Weldon T. Burton should be granted because it provides information that is highly relevant to the presentation and adjudication of PSP's General Rate Case and will therefore assist the Commission and the parties. In fact, Exhibit WTB-05 to Mr. Burton's testimony provides much of the information requested in a September 8, 2022 set of 12 Data Requests issued by UTC Staff.

Respectfully submitted this 9th day of September, 2022.

HAGLUND KELLEY LLP

s/ Michael E. Haglund

Michael E. Haglund, OSB No. 772030

Julie Weis, WSBA No. 43427

Eric E. Brickenstein, OSB No. 142852

HAGLUND KELLEY LLP

2177 SW Broadway

Portland, OR 97201

Telephone: (503) 225-0777

Facsimile: (503) 225-1257

Email: mhaglund@hk-law.com

jweis@hk-law.com

ebrickenstein@hk-law.com

Attorneys for Respondent