

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-130617

PUGET SOUND ENERGY, INC.'S
MOTION FOR LEAVE TO FILE
SUPPLEMENTAL TESTIMONY AND
EXHIBITS

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE") hereby requests that the Commission grant it leave to file prefiled supplemental direct testimonies and exhibit submitted with this motion. The purpose of this supplemental evidence is to provide analysis supporting PSE's decision to renew its 115 megawatt ("MW") contract with the Bonneville Power Administration ("BPA"), which was not previously available. Additionally, PSE seeks to file supplemental direct testimony of Cara G. Peterman, Exhibit No. ___(CGP-1T), the sole purpose of which is to adopt the prefiled evidence of Aliza Seelig, as Ms. Seelig is no longer employed by PSE. The supplemental testimony PSE requests to file does not result in any changes to the power costs in this proceeding, but provides additional, new evidence—that was not previously available—supporting PSE's as-filed power costs.

2 PSE filed its prefiled direct evidence in this proceeding on April 25, 2013 and supplemental direct evidence on July 2, 2013. In the prefiled direct testimony of Tom A.

PSE'S MOTION FOR LEAVE
TO FILE SUPPLEMENTAL
TESTIMONY AND EXHIBITS - 1

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DeBoer, Exhibit No. ____ (TAD-1T), Mr. DeBoer explained that the renewal deadline for PSE's 115 MW Mid-Columbia ("Mid-C") transmission contract with BPA was to occur July 31, 2013 – subsequent to the date of PSE filing this power cost only rate case – and that PSE was in the process of analyzing the costs and benefits of renewing this 115 MW transmission contract for a new contract term beginning October 1, 2013. The extra time allowed PSE to complete its 2013 Integrated Resource Plan ("IRP") analyses and incorporate changes from that IRP and any other modifications thereafter into the analysis. The extra time also allowed PSE to obtain the most current information from the BPA regarding the availability of transmission on the BPA system. PSE indicated that it would provide the analysis supporting its renewal decision during the course of this proceeding. Accordingly, PSE requests permission to file its analysis at this time.

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

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.

4 PSE's motion should be granted because it does not result in any changes to the power costs in this proceeding, and the supplemental testimony will allow PSE to provide the most accurate and timely support for its quantitative and qualitative evaluation of the 115 MW Mid-C firm transmission renewal.

5 PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand. Allowing this information now will reduce the burden on PSE witnesses and other parties that would otherwise result from explaining the analysis in data request responses or rebuttal testimony. Submission of the supplemental evidence at this time, and in light of the five-day response time for data requests, provides the other parties the opportunity to engage in discovery regarding the updated information prior to filing their response testimony (August 14, 2013). Therefore, the parties to this proceeding will not be disadvantaged by this filing.

6 The Commission has expressed the importance of having a full and complete record upon which to base its decisions. In PSE's 2011 general rate case ("GRC"),¹ PSE was granted leave to file supplemental testimony. (*See* Order 07 at ¶ 5, dated January 27, 2012.) In PSE's 2007 GRC,² the Commission also granted PSE's Motion for Leave to File Supplement Testimony, stating:

The Commission's paramount interest is in having a full record with the best available evidence upon which to base its decisions. When the Company offers supplemental evidence, as here, the Commission balances its interest in having up-to-date information against the needs of the parties to have adequate opportunities for discovery and the development of their own testimony and exhibits....

¹ Docket Nos. UE-111048 and UG-111049 (consolidated).

² Docket Nos. UE-072300 and UG-072301 (consolidated).

Order 08 at ¶10. PSE believes that this request to supplement its filing will allow for “a more orderly process and will promote fairness.” (*See id.* at ¶9)

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

DATED: July 29, 2013

Respectfully Submitted,

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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UE-130617
)	
Complainant,)	ORDER 04
)	
v.)	[PROPOSED] ORDER GRANTING
PUGET SOUND ENERGY, INC.,)	PSE'S MOTION FOR LEAVE TO
)	FILE SUPPLEMENTAL
Respondent.)	TESTIMONY AND EXHIBITS

MEMORANDUM

- 1 On April 25, 2013, Puget Sound Energy, Inc. ("PSE"), filed with the Washington Utilities and Transportation Commission ("Commission") its request to adjust the Power Cost Rate reflected in PSE's Schedule 95. PSE's initial filing included testimony in support of its request, including the prefiled direct testimony of Tom A. DeBoer and Aliza Seelig. PSE filed supplemental testimony and exhibits in this proceeding on July 2, 2013.

- 2 PSE filed a Motion for Leave to File Supplemental Testimony and Exhibit ("Motion") on July 29, 2013. PSE's Motion seeks leave to file analysis supporting PSE's decision to renew its 115 megawatt ("MW") contract with the Bonneville Power Administration ("BPA"). Additionally, PSE seeks to file supplemental direct testimony of Cara G. Peterman, Exhibit No. ____ (CGP-1T), the sole purpose of which is to adopt the prefiled evidence of Aliza Seelig, as Ms. Seelig is no longer employed by PSE. Mr. DeBoer's and Ms. Peterman's supplemental testimony and exhibits were attached to PSE's Motion.

- 3 The Commission afforded the parties an opportunity to respond to PSE's Motion. [No parties objected].

4 PSE states the renewal deadline for PSE’s 115 MW Mid-Columbia transmission contract with BPA was to occur July 31, 2013 – subsequent to the date of PSE filing this power cost only rate case – and that PSE was in the process of analyzing the costs and benefits of renewing this 115 MW transmission contract for a new contract term beginning October 1, 2013. PSE states that the extra time allowed PSE to complete its 2013 Integrated Resource Plan (“IRP”) analyses and incorporate changes from that IRP and any other modifications thereafter into the analysis, which is now available. PSE also states that the extra time also allowed PSE to obtain the most current information from the BPA regarding the availability of transmission on the BPA system.

5 [As none of the parties have objected], and given the importance of a full and complete record, the Commission determines that PSE’s Motion should be granted.

ORDER

6 The Commission grants the Motion for Leave to File Supplemental Testimony and Exhibit, filed by Puget Sound Energy, Inc.

Dated at Olympia, Washington, and effective _____.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARGUERITE E. FRIEDLANDER
Administrative Law Judge