

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of) DOCKET NOS. UE-121697/UG-121705
) and UE-130137/UG-130138
PUGET SOUND ENERGY, INC., and)
NW ENERGY COALITION)
)
For an Order Authorizing PSE to Implement) EXPEDITED MOTION REQUESTING
Electric and Natural Gas Decoupling) AUTHORIZATION TO FILE
Mechanisms and to Record Accounting) SUPPLEMENTAL TESTIMONY
Entries Associated with the Mechanisms)
_____)

1 Pursuant to WAC §§ 480-07-375(1)(d) and 480-07-460(b)(ii), the Industrial Customers of Northwest Utilities (“ICNU”) submits this Expedited Motion Requesting Authorization to File Supplemental Testimony of Michael Gorman, submitted with this motion and identified as Exhibit No. ___ (MPG-23T), as well as the accompanying exhibit, identified as Exhibit No. ___ (MPG-24). The Washington Utility and Transportation Commission’s (“WUTC,” or the “Commission”) rules require that “[p]arties 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”^{1/} As explained below, Mr. Gorman’s Supplemental Testimony does not correct errors of fact, but rather ensures the development of a full and complete record based on the most current information available. Given the tight schedule in these cases, ICNU respectfully requests that this motion be considered on an expedited basis.

2 The Commission has granted motions to file supplemental testimony when the purpose of the filing was to present more recent data than the information available when a party

^{1/} WAC § 480-07-460(b)(ii).

prepared its original filing.^{2/} Such a motion should be granted because “[t]he Commission’s paramount interest is in having a full record with the best available evidence upon which to base its decisions.”^{3/} The primary purpose of Mr. Gorman’s Supplemental Testimony is to evaluate and incorporate into his analysis Puget Sound Energy, Inc.’s (“PSE” or the “Company”) electric accounting report filed on April 30, 2013. Specifically, Mr. Gorman describes how the results of operations report impacts, changes or supports his testimony filed on April 26, 2013. Due to the expedited nature of these proceedings, Mr. Gorman’s testimony was due on April 26, 2013, meaning that the Company’s most recent results of operations was not available to him at the time he prepared his testimony. Because this accounting report provides the most up-to-date information regarding PSE’s financial performance for 2012, the record before the Commission will be more comprehensive if this report is considered.

3 No party will be unduly prejudiced by Mr. Gorman’s supplemental testimony. PSE is intimately familiar with the accounting report, as it is the author. Mr. Gorman’s testimony does not introduce new issues or drastically change the recommendations found in his previous testimony; rather, he uses the most recently available information to support his previous testimony. Thus, despite the expedited schedule in this proceeding, parties will have no difficulty responding to his testimony, should they so desire.

4 Accordingly, ICNU respectfully requests that the Commission grant this Motion Requesting Authorization to File Supplemental Testimony on an expedited basis in order to ensure a full record based upon best available information in these dockets.

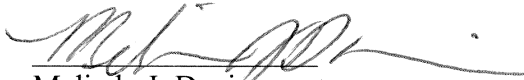
^{2/} WUTC v. PSE, Docket Nos. UE-072300, UG-072301, Order 08 at ¶ 9 (May 5, 2008).

^{3/} Id. ¶ 10.

Dated in Portland, Oregon, this 7th day of MAY, 2013.

Respectfully submitted,

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