## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

V.

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PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-070565

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

Pursuant to WAC 480-07-375(1)(d) and 480-07-460(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the supplemental prefiled direct testimony and exhibits submitted with this motion. The purpose of these revisions is to update the original testimony and exhibits of David Mills, Roger Garratt, John Story and David Hoff for information that was not available to PSE at the time it filed its original direct testimony on March 20, 2007.

This supplemental testimony updates PSE's power cost projections for the rate year as well as various adjustments PSE had proposed to test year figures based on more recent data than the information PSE had available to it when it prepared its original filing.

Accordingly, PSE is filing with this motion the following prefiled supplemental direct testimony and exhibits:

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

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•	Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit
	No(DEM-7T);
•	First Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills,
	Exhibit No(DEM-8);
•	Second Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills
	Exhibit No(DEM-9);
•	Third Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills,
	Exhibit No(DEM-10);
•	Prefiled Supplemental Direct Testimony of Roger Garratt, Exhibit No(RG-
	20T);
•	First Exhibit to the Prefiled Supplemental Direct Testimony of Roger Garratt,
	Exhibit No(RG-21);
•	Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No(JHS-
	9T);
•	First Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story,
	Exhibit No(JHS-10);
•	Second Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story,
	Exhibit No(JHS-11C);
•	Third Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story,
	Exhibit No. (JHS-12).

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- Prefiled Supplemental Direct Testimony of David W. Hoff, Exhibit No.
  \_\_(DWH-6T)
- First Exhibit to the Prefiled Supplemental Direct Testimony of David W. Hoff, Exhibit No. \_\_\_(DWH-7);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of David W. Hoff, Exhibit No. \_\_\_(DWH-8);

The Commission's procedural rules require PSE to seek leave for filing its proposed supplemental direct testimony and exhibits 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.

PSE's motion should be granted. PSE seeks to add to the record supplemental evidence that will more accurately reflect PSE's projected power costs and electric revenue deficiency. At the time of its initial filing, PSE gave notice of its intent to update its projected power costs. PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand the required changes from PSE's prefiled direct evidence. Allowing PSE to supplement its evidence now will reduce the burden on other parties that would result from having to attempt to update or correct PSE's original filing themselves based on information made available to them in data request responses. Submission of the supplemental testimony at this time also provides the other parties the opportunity to address the updated

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

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information in their response testimonies (due June 15, 2007), which would not be possible if

PSE first provided this information in PSE's rebuttal testimony. Finally, PSE believes that the

other parties to this proceeding are already aware of the substance of the changes made in the

supplemental direct testimony, and thus will be neither surprised nor disadvantaged by this

filing.

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For the reasons set forth above, PSE respectfully requests that the Commission enter an

order granting PSE leave to supplement its prefiled evidence in this proceeding and accepting for

filing the supplemental testimony and exhibits submitted with this motion.

**DATED:** May 23, 2007

Respectfully Submitted,

PERKINS COIE LLP

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Jason Kuzma, WSBA No. 31830

Attorneys for Puget Sound Energy, Inc.

**PSE's MOTION FOR LEAVE** TO FILE SUPPLEMENTAL TESTIMONY AND EXHIBITS