

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
FILE REPLY IN SUPPORT OF
MOTION TO SUPPLEMENT THE
RECORD**

MOTION

1. Pursuant to WAC 480-07-370(5)(b), Respondent Puget Sound Pilots (“PSP”) move for leave to file the Reply in Support of Motion to Supplement the Record 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

I. BACKGROUND.

2. On September 9, 2022, Puget Sound Pilots (“PSP”) filed a Motion to Supplement the Record accompanied by the proposed Supplemental Testimony of Weldon T. Burton.
3. On September 16, 2022, UTC Staff filed a response to PSP’s motion stating that “Commission Staff (Staff) does not oppose PSP’s Motion, but requests that the Commission (1) order PSP to clarify how its supplemental material revises or replaces existing testimony and exhibits filed by PSP, and (2) continue all remaining procedural deadlines, other than the

settlement conference dates, by an additional four weeks to allow the parties sufficient time to review the supplemental material and update existing analysis.”

II. ARGUMENT.

4. WAC 480-07-370(5)(b) grants the Commission discretion to allow a reply in support of a petition where a reply is necessary to address new facts or legal argument raised in a response. In this case, Staff’s response to PSP’s motion indicates that Staff does not oppose PSP’s motion subject to two conditions: (1) a four-week continuance of procedural deadlines with the exception of settlement conference dates; and (2) that PSP clarify how its supplemental material revises or replaces existing testimony and exhibits filed by PSP. PSP seeks leave to file a brief reply confirming that it has no objections to Staff’s requests, and asks that its Motion to Supplement the Record be granted subject to Staff’s recommended conditions.

III. CONCLUSION.

5. PSP’s motion should be granted and the proposed reply should be entered in the record.

Respectfully submitted this 23rd day of September, 2022.

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