

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-072300

Docket No. UG-072301

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

1 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 exhibit submitted with this motion. The purpose of this supplemental prefiled direct testimony and exhibit is to update the prefiled direct testimony and exhibits of Roger Garratt for information relating to the Company’s purchase of the Sumas Cogeneration Station that was not available to PSE at the time it filed direct testimony on December 3, 2007.

2 At the time PSE filed the prefiled direct testimony and supporting exhibits in this proceeding, PSE and Sumas Cogeneration Company, LP (“SCCLP”) had agreed to all final terms regarding the purchase and sale of the Sumas Cogeneration Station but had not yet finalized the definitive agreements. Therefore, the prefiled direct testimony of Roger Garratt discusses the terms of the purchase and sale of the Sumas Cogeneration Station but does not

provide the definitive agreements for such purchase and sale as an exhibit. PSE advised the Commission and the parties at the time of its original filing that it would need to supplement the prefiled direct testimony of Roger Garratt to provide the definitive agreements once they were executed. PSE and SCCLP subsequently finalized and executed definitive agreements for the purchase and sale of the Sumas Cogeneration Station on December 7, 2007, and PSE now seeks leave to file the supplemental prefiled direct testimony and exhibit to provide copies of such definitive agreements.

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

- Prefiled Supplemental Direct Testimony of Roger Garratt, Exhibit No. \_\_\_(RG-53T); and
- First Exhibit to the Prefiled Supplemental Direct Testimony of Roger Garratt, Exhibit No. \_\_\_(RG-54C).

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

6 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 and gas revenue deficiency. 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

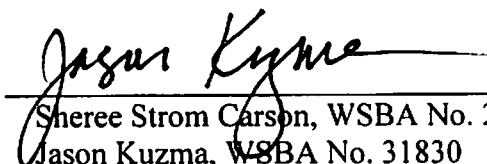
evidence. Allowing PSE to supplement its evidence now will reduce the burden on other parties that would result from having to attempt to update or correct PSE's original filing themselves based on information made available to them in data request responses. Submission of the supplemental direct testimony at this time also provides the other parties the opportunity to address the updated information in their response testimonies, which would not be possible if PSE first provided this information in PSE's rebuttal testimony.

7 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 exhibit submitted with this motion.

Dated as of the 21st day of December, 2007.

Respectfully Submitted,

**PERKINS COIE LLP**

  
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