

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.  
and NW ENERGY COALITION

For an Order Authorizing PSE To  
Implement Electric and Natural Gas  
Decoupling Mechanisms and To Record  
Accounting Entries Associated With the  
Mechanisms

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET NOS. UE-121697  
and UG-121704

DOCKETS UE-130137 and  
UG-130138

**NORTHWEST INDUSTRIAL GAS  
USERS' MOTION FOR LEAVE TO  
FILE SUPPLEMENTAL  
TESTIMONY AND PROPOSED  
SUPPLEMENTAL TESTIMONY OF  
EDWARD A. FINKLEA**

**MOTION**

Pursuant to WAC 480-07-740 and an email communication from Judge Moss dated May 8, 2013, the Northwest Industrial Gas Users (“NWIGU”) submit this Motion for Leave to File Supplemental Testimony. Attached to this Motion is the proposed Supplemental Testimony of Edward A. Finklea identified as Exhibit No. \_\_ (EAF-3T).

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## POINTS AND AUTHORITIES

NWIGU is a party in consolidated Dockets UE-121697 and UG-121705 (the “Decoupling Docket”) and consolidated Dockets UE-130137 and UG-130138 (PSE’s Expedited Rate Filing or “ERF Docket”). NWIGU filed its initial testimony in the Decoupling Docket and the ERF Docket on April 26, 2013. After NWIGU filed that testimony, NWIGU continued to participate in settlement discussions with other parties. As a result of those discussions, NWIGU entered into a settlement with Staff, Puget Sound Energy (“PSE”) and the Northwest Energy Coalition (“NVEC”). As part of that settlement, Staff, PSE and NVEC agreed to revise their existing Multiparty Settlement to address concerns NWIGU raised in its initial testimony. NWIGU, in turn, agreed to support the Multiparty Settlement, as modified by NWIGU’s agreement with Staff, PSE and NVEC.

NWIGU has attached a copy of its proposed testimony to this Motion. The testimony, identified as Exhibit No. \_\_ (EAF-3T), describes why NWIGU believes the Multiparty Settlement, as modified by NWIGU’s settlement, is in the public interest and should be approved.

WAC 480-07-740(2)(b) requires proponents of a proposed settlement to present sufficient evidence to support its adoption. NWIGU’s joinder to the Multiparty Settlement was filed on May 8, 2013. Although the hearing in this matter will take place shortly after this Motion and the proposed supplemental testimony are filed, other parties will not be prejudiced by the granting of this Motion. Prior to the filing of NWIGU’s joinder in the Multiparty Settlement, NWIGU informed non-settling parties that it had reached an agreement in principle with PSE, Staff and NVEC. Moreover, the issues addressed by NWIGU’s joinder in the Multiparty

Settlement are largely the same issues NWIGU addressed in its initial testimony and are consistent with NWIGU's recommendations in that testimony. To the extent other parties disagree with those recommendations, they have already had, or will have, the opportunity to address those disagreements in testimony and during the hearing.

Based on the foregoing, NWIGU respectfully requests the Commission to provide NWIGU an opportunity to satisfy its obligations under WAC 480-07-740(2)(b) by granting it leave to file supplemental testimony presenting evidence to support adoption of the settlement.

Dated: May 13, 2013.

Respectfully submitted,

/s/ Chad M. Stokes

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Of Attorneys for the  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing NORTHWEST INDUSTRIAL GAS USERS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY AND PROPOSED SUPPLEMENTAL TESTIMONY OF EDWARD A. FINKLEA upon all parties of record (listed below) in this proceeding by electronic mail and by addressed with first class postage prepaid.

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