BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| 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. | DOCKETS UE-121697 and  UG-121705 (*consolidated*)  DOCKETS UE-130137  and UG-130138 (*consolidated*)  COMMISSION STAFF’S RESPONSE TO PUBLIC COUNSEL’S MOTION FOR LEAVE TO PRESENT ORAL SURREBUTTAL |

1. Under WAC 480-07-375(4), Commission Staff submits this response to Public Counsel’s Motion to for Leave to Present Oral Surrebuttal. The Commission should deny the motion.
2. In its motion, Public Counsel vaguely alleges that “the filed testimony includes detailed responses to Public Counsel witnesses and includes analyses not previously presented.” Motion at 2. To the contrary, Commission Staff’s witness, Mr. Schooley, filed proper rebuttal testimony, the filing of which is an all-too-infrequent boon, from Staff’s perspective. Mr. Schooley responded to the assertions made by Public Counsel in its responsive testimony. Public Counsel’s unsupported assertions here should not serve as a basis for a grant of surrebuttal, which the Commission should deem extraordinary relief. Public Counsel offers no basis on which the Commission could grant Public Counsel’s Motion for Leave to Present Surrebuttal.

DATED this 13th day of May 2013.

Respectfully submitted,

ROBERT W. FERGUSON

Attorney General

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SALLY BROWN

Senior Assistant Attorney General

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