

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.

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.

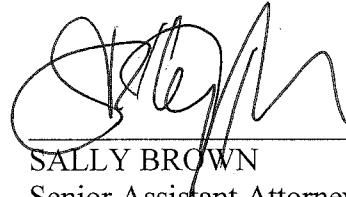
2 In its motion, Public Counsel vaguely alleges that "the filed testimony includes detailed responses to Public Counsel witnesses and includes analyses not previously presented." Motion at 2. To the contrary, Commission Staff's witness, Mr. Schooley, filed proper rebuttal testimony, the filing of which 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

A handwritten signature in black ink, appearing to read 'Sally Brown', written over a horizontal line.

SALLY BROWN
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff