

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-060266

Docket No. UG-060267

PUGET SOUND ENERGY, INC.'S
MOTION FOR LEAVE TO FILE
REVISED TESTIMONY AND EXHIBITS

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the revised prefiled direct testimony and exhibits submitted with this motion. The purpose of these revisions is to correct the testimony of Janet Phelps and certain exhibits to her testimony, relating to PSE's rate spread, rate design and revenue adjustments, after PSE became aware of minor, but substantive, calculation and methodological errors in this evidence.

2 PSE filed its prefiled direct evidence in this general rate case proceeding on February 15, 2006. After filing its direct testimony and exhibits, PSE became aware of substantive errors that require correction. PSE has determined that two exhibits to the prefiled direct testimony of Janet K. Phelps contained calculation and methodological errors that were minor in nature and did not result in a change in the proposed rates. However, these errors nonetheless caused inconsistencies in PSE's pro forma revenue calculations and PSE's rate spread and rate design

PSE's MOTION FOR LEAVE
TO FILE REVISED TESTIMONY 1
AND EXHIBITS

testimony. In addition, the balancing charge applicable to Schedule 57 transportation customers was erroneously applied to two contract customers. PSE has corrected that increase in the attached revised exhibits. Further, PSE has revised the direct prefiled testimony of Janet K. Phelps, Exhibit No. ____ (JKP-1T) in order to reflect these revisions and to clarify Ms. Phelps' testimony regarding the revenue adjustment factor. Accordingly, PSE would like to revise the following prefiled rebuttal testimony and exhibits:

- Prefiled Direct Testimony of Janet K. Phelps, Exhibit No. ____ (JKP-1T) at pages 29, 30, 36, and 37;
- Second Exhibit to the Prefiled Direct Testimony of Janet K. Phelps, Exhibit No. ____ (JKP-3), page 2; and
- Sixth Exhibit to the Prefiled Direct Testimony of Janet K. Phelps, Exhibit No. ____ (JKP-7), pages 1, 5, 6, and 7.

4 The Commission's procedural rules require PSE to seek leave for filing its proposed revisions 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.

5 PSE's motion should be granted. PSE seeks to make relatively minor revisions to the general rate case filing, and PSE has sought to prepare and present its revised evidence in a manner that makes it easy for other parties to understand the changes that are required. Allowing

PSE's MOTION FOR LEAVE
TO FILE REVISED TESTIMONY 2
AND EXHIBITS

these changes now will reduce the burden on PSE witnesses and other parties that would otherwise result from addressing these discrepancies in response testimony.

6 For the reasons set forth above, PSE respectfully requests that the Commission enter an order granting PSE leave to revise its prefiled evidence in this proceeding and accepting for filing the revised testimony and exhibits submitted with this motion.

DATED: April ____, 2006

Respectfully Submitted,

PERKINS COIE LLP

Kirstin S. Dodge, WSBA No. 22039
Jason Kuzma, WSBA No. 31830
Attorneys for Puget Sound Energy, Inc.

PSE's MOTION FOR LEAVE
TO FILE REVISED TESTIMONY 3
AND EXHIBITS

[07771-0887-000000/UE-060266 Motion for Leave to File Revised
Testimony PSE 040306.doc]

Perkins Coie LLP
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
Phone: (425) 635-1400
Fax: (425) 635-2400