

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY

**Clean Energy Implementation Plan
Pursuant to WAC 480-100-640**

Docket UE-210795

**PUGET SOUND ENERGY'S MOTION
FOR LEAVE TO FILE REVISED
TESTIMONY**

I. INTRODUCTION AND RELIEF REQUESTED

1. Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(a)(i), Puget Sound Energy ("PSE") hereby requests that the Washington Utilities and Transportation Commission ("Commission") grant it leave to file the revised rebuttal testimony submitted with this motion. The purpose of the revision is to correct certain substantive errors relating to PSE's analysis of the social cost of greenhouse gases as a dispatch cost. PSE provides its proposed revisions with this motion.
2. The Commission's procedural rules require PSE to seek leave for filing its proposed revisions because they represent a substantive change:

Parties must seek leave from the presiding officer by written motion if they wish to file revised prefiled testimony or exhibits that include substantive changes. A party proposing such changes may submit the proposed revisions with its motion.

WAC 480-07-460(1)(a)(i). The corrections, while substantive, are relatively minor and require corrections to only one prefiled rebuttal testimony. PSE therefore files this motion seeking leave

to submit the Revised Prefiled Rebuttal Testimony of Phillip J. Popoff, 220066-PSE-Exh. PJP-1Tr-01-09-23, submitted with this motion.

II. FACTUAL BACKGROUND

3. After PSE submitted prefiled rebuttal testimony in this case on December 12, 2022, and while responding to discovery issued in response to that rebuttal testimony, PSE discovered inadvertent errors requiring correction. Specifically, PSE discovered the following small but substantive computational errors in Tables 1 through 3 of the Prefiled Rebuttal Testimony of Phillip J. Popoff, Exh. PJP-1T:
 4. First, in preparing Table 1 of Exh. PJP-1T, PSE inadvertently copied and pasted incorrect numbers into the column entitled “New Non-emitting”, and the rows entitled “SCGHG as Externality Cost” and “SCGHG in Dispatch.”¹ As a result, the numbers in the “New Non-emitting” column and the associated “Total” column in Table 1 are incorrect. The revised testimony submitted herewith corrects the errors in Table 1.
 5. Second, PSE inadvertently used the incorrect 2021 integrated resource plan (“IRP”) generic resource costs instead of the 2021 National Renewable Energy Laboratory’s Annual Technology Baseline generic resource costs in the No-CETA cases modeling, both for “SCGHG as Externality Cost” and “SCGHG in Dispatch”, displayed in Table 2 of Exh. PJP-1T. PSE’s revised testimony submitted herewith corrects this error by updating and re-running the model with the correct 2021 National Renewable Energy Laboratory’s Annual Technology Baseline

¹ “SCGHG” means the social cost of greenhouse gas.

generic resource costs, which is consistent with the 2021 clean energy implementation plan (“CEIP”).

6. Third, PSE has revised certain narrative text and Table 3 of Exh. PJP-1T to incorporate the effect of correcting the above-referenced computational errors. In summary, the corrections mean (1) the long-term capacity expansion model adds 800 megawatts (“MW”) of Washington Wind in 2025, rather than the 200 MW stated in Exh. PJP-1T, and (2) one Frame Peaker unit (237 MW) is moved from 2025 to 2026. The correct total cost increase of the No-CETA case is therefore \$89.4 million rather than \$50.6 million over the four-year CEIP period. Total emissions when the social cost of greenhouse gases is applied as a dispatch cost over the four-year CEIP period are 2.55 percent lower than the total emissions when the social cost of greenhouse gases is treated as an externality cost, rather than 0.68 percent lower as previously stated. The revised rebuttal testimony provided demonstrates that the additional 800 MW of Washington wind is not needed until 2027 to meet the Peak Capacity Needs. This conclusion does not change.

III. AUTHORITY AND SUPPORT

7. PSE’s motion should be granted. PSE seeks to make minor, yet substantive revisions to correct calculations in one rebuttal testimony. 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. *See* WAC 480-07-460(1)(a)(iii). The revisions to the testimony are shown in legislative style, with strikeouts and in red to indicate changes, as provided in WAC 480-07-460(1)(a)(iii).
8. Although the computational errors in PSE’s analysis of the social cost of greenhouse gases as a dispatch cost are relatively minor errors, and they do not change the peak capacity

needs or the overall substance of Mr. Popoff's rebuttal testimony, the corrections should be allowed to accurately reflect PSE's modeling and analysis in this case. The Commission has the authority to grant PSE's motion pursuant to WAC 480-07-460(1)(a)(i), and the Commission should grant PSE's request to ensure the record in this proceeding is complete and accurate. Allowing PSE to submit the revised testimony will correct the record in a timely fashion and in compliance with Commission rules.


9. PSE has made great efforts to identify, correct, confirm, and revise the affected testimony as soon as possible after it discovered the computational errors. In its response to Front and Centered and NW Energy Coalition's Data Request Nos. 177 and 178, PSE provided notice to all parties of these errors and informed the parties that PSE would be filing this motion. Allowing PSE to revise Exh. PJP-1T will reduce the burden on PSE witnesses, other parties, and the Commissioners, which would otherwise result from addressing these corrections at hearing. The discovery cutoff in this proceeding has not yet occurred, and with this motion all parties should have sufficient time to review PSE's minor corrections and issue any data requests they feel are necessary.² No parties will be prejudiced by allowing PSE to revise Exh. PJP-1T with corrected data.

10. 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 rebuttal testimony submitted with this motion.

² See Order 04 (Prehearing Conference Order) at App. B, setting the last day to issue data requests for Jan. 13, 2023.

RESPECTFULLY SUBMITTED this 9th day of January, 2023.

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