

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY, INC.

2021 Clean Energy Implementation Plan

DOCKET NO. UE-210795

**NW ENERGY COALITION AND
FRONT AND CENTERED
MOTION FOR LEAVE TO FILE REVISED
TESTIMONY OF ROGER D. COLTON**

INTRODUCTION AND RELIEF

Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(a)(i), NW Energy Coalition and Front and Centered hereby request that the Washington Utilities and Transportation Commission (“Commission”) grant them leave to file the revised Prefiled Response Testimony of Roger D. Colton submitted with this motion.

The purpose of the revision is to correct a single number on page 15 of the Prefiled Response Testimony of Roger D. Colton.

STATEMENT OF FACTS

Table 1 of Mr. Colton’s testimony shows the percentage of the population living below 200% of the federal poverty line in the Qualified Census Tracts (“QCTs”) identified by the U.S. Department of Housing and Urban Development (“HUD”) for purposes of HUD’s Low-income Housing Tax Credit that are not “named communities” for purposes of PSE’s CEIP. As a result of an inadvertent calculation error, Table 1 erroneously cited this figure as 21.5%; in fact, it is 41.3%. The incorrect figure is also repeated in the text on line 1 of page 15.

NW Energy Coalition and Front and Centered discovered this error in responding to PSE’s Data Request No. 002 and alerted the parties to this error in their response to the Data Request.

DISCUSSION

Granting this motion and allowing the parties to formally correct Mr. Colton's testimony in advance of the hearing will benefit all parties by formally correcting the record in a timely fashion. There is no reason to believe that correcting the erroneous figure will prejudice any party; the revised figure simply strengthens Mr. Colton's argument that PSE should include the census block groups that are in QCTs in its Vulnerable Populations designations because they represent a significant concentration of vulnerable people who have been excluded from PSE's "named community" designations.

CONCLUSION

For all of these reasons, NW Energy Coalition and Front and Centered respectfully request that the Commission enter an order granting their motion and accepting for filing the revised Prefiled Response Testimony of Roger D. Colton submitted with this motion.

Dated this 11th day of January, 2023.

Respectfully submitted,



Amanda Goodin, WSBA # 41312
Molly Tack-Hooper, WSBA # 56356
Earthjustice
810 Third Avenue, Suite 610
Seattle, WA 98104
Ph: (206) 343-7340
agoodin@earthjustice.org
mtackhooper@earthjustice.org
*Attorneys for NW Energy Coalition and
Front and Centered*