

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

DOCKET TP-250574

ORDER 03

GRANTING MOTION TO REVISE;
DENYING MOTION FOR LEAVE TO
REPLY; GRANTING IN PART AND
DENYING IN PART MOTION TO
STRIKE

BACKGROUND

- 1 On July 29, 2025, Puget Sound Pilots (PSP) filed Tariff No. 3 with the Washington Utilities and Transportation Commission (Commission), revising its currently effective Tariff No. 2. PSP characterizes its filing as a general rate case (GRC). PSP's proposed revised tariff sheets provide an effective date of August 29, 2025. Also on July 29, 2025, PSP filed testimony, proposed exhibits, and supporting documentation related to its proposed tariff revisions. PSP proposes to increase the organization's revenue requirement from approximate \$42.0 million to \$67.2 million (a 60.0 percent increase).
- 2 On October 10, 2025, the Commission issued Order 02 Prehearing Conference Order (Order 02). Among other matters, Order 02 set a January 2, 2026, deadline for filing responsive testimony and a February 2, 2026, deadline for filing rebuttal and cross-answering testimony.
- 3 On January 2, 2026, Commission staff (Staff) and Pacific Merchant Shipping Association (PMSA) filed response testimony.
- 4 On January 29, 2026, Staff filed a Motion for Leave to Revise Testimony and Exhibits of Staff Witness Scott Sevall (Motion to Revise). Staff's Motion to Revise requests that the Commission allow Staff to file revised versions of Sevall's testimony and two exhibits,¹ after discovering that Staff's proposed revenue requirement did not incorporate

¹ Specifically, Staff seeks to file amended versions of Sevall's response testimony, Exh. SS-1T, and two of Sevall's exhibits, Exh. SS-2 and Exh. SS-4. Motion to Revise at 2 ¶ 5.

adjustments from another Staff witness.² Staff explains that the error in the revenue requirement not only affects Staff's overall revenue requirement recommendation, but also its recommendation regarding rate spread and rate design.³ Staff states that it worked to remedy the error as soon as practicable, and that the other parties will not be prejudiced by the revision because Staff provided testimony regarding the adjustments that were not properly incorporated into Sevall's testimony and exhibits.⁴ Staff further contends that its revenue requirement would change in its cross-answering testimony, and that its revisions are intended to provide a clear record for the Commission's review.⁵

5 No party filed a response to Staff's Motion to Revise.

6 On February 2, 2026, PSP, Staff, and PMSA filed rebuttal and cross-answering testimony. In cross-answering testimony, Staff proposes a modification to its recommendation regarding pilot distributed net income (DNI)⁶ based on a new expense ratio analysis of other pilotage grounds, which was inspired by PMSA's exhibit calculating a ratio of PSP pilot DNI to Washington State Ferry (WSF) Masters annual pay ratio.⁷ Using historical financial data provided by PSP and other public sources, Staff's analysis considers the relationship between revenue and expenses to calculate an average revenue to expense ratio, which Staff then uses to establish a range of reasonableness for DNI.⁸ Based on this analysis, Staff provides a revised recommendation for the DNI that the Commission should establish in this proceeding.⁹

7 On February 10, PSP filed a Motion to Strike Portions of Staff's Cross-Answering Testimony (Motion to Strike). Specifically, PSP requests that the Commission strike portions of Staff's cross-answering testimony and exhibits related to Staff's proposed expense ratio analysis that modifies Staff's recommendation regarding the DNI component of the pilotage revenue requirement calculation.¹⁰ PSP argues that by

² Motion to Revise at 2-3 ¶ 6.

³ Motion to Revise at 3 ¶ 7.

⁴ Motion to Revise at 3-4 ¶¶ 9-10.

⁵ Motion to Revise at 4 ¶ 10.

⁶ "Distributed Net Income" is also referred to as "Distributable Net Income." *See* Sevall, Exh. SS-8T at 4:12, 6:4-5.

⁷ Sevall, Exh. SS-8T at 5:17 – 6:2 (discussing Moore, Exh. MM-16).

⁸ Sevall, Exh. SS-8T at 6:12-19, 8:1-5; Exh. SS-11.

⁹ Sevall, Exh. SS-8T at 8:6-11.

¹⁰ Motion to Strike at 1-2 ¶ 2.

proposing this new methodology in cross-answering testimony rather than response testimony, Staff has unfairly deprived PSP of the opportunity to review and respond to Staff's analysis.¹¹ PSP asserts that presenting updated or new information for the first time on rebuttal, including alternative proposals, conflicts with Commission procedure, and that parties are expected to make proposals as part of their direct cases.¹²

8 PSP maintains that Staff's new analysis has not been raised in other parties' testimony or proceedings prior to Staff's cross-answering testimony, was presented at a time when no other party can respond to Staff's proposal, and the Commission has previously stricken rebuttal testimony that offered a new proposal.¹³ PSP further states that insofar as Staff's new analysis affects its DNI recommendation, the new analysis is significant as pilot DNI is a central matter in this proceeding that accounts for almost two-thirds of PSP's revenue requirement.¹⁴ PSP also argues that Staff's new methodology relies on new information and contradicts Staff's response testimony regarding DNI.¹⁵ PSP asserts that Staff should have raised its proposed methodology as part of its response testimony, which would have afforded all parties an opportunity to respond as part of rebuttal and cross-answering testimony, and that cross examination is not an adequate substitute for pre-filed testimony.¹⁶ PSP recommends that the Commission strike portions of Staff's cross-answering testimony and related exhibits or provide PSP with an opportunity to file testimony to rebut Staff's analysis.¹⁷

9 On February 18, 2026, Staff filed a Response to PSP's Motion to Strike (Staff's Response). Staff argues that the Commission should deny the Motion to Strike because Staff's testimony is within the scope of cross-answering testimony, and PSP is not prejudiced by Staff's testimony.¹⁸ Staff argues that DNI is akin to a "return on equity" for the pilots, that DNI is a unique component of the pilots revenue requirement, and that there is no single correct return, but rather a range of reasonable returns from which the

¹¹ Motion to Strike at 6 ¶ 13.

¹² Motion to Strike at 6-7 ¶ 14 (*citing WUTC v. Puget Sound Power & Light Co.*, Dockets U-89-2688-T & U-89-2955-T, Third Supplemental Order at 79 (Jan. 1990)).

¹³ *See also*, Motion to Strike at 7-8 ¶¶ 15-16 (*citing WUTC v. Avista Corp.*, Dockets UE-160228 & UG-160229 (Consolidated), Order 04 (Octo. 10 2016)).

¹⁴ Motion to Strike at 8-9 ¶¶ 17-18.

¹⁵ Motion to Strike at 8-9 ¶ 18.

¹⁶ Motion to Strike at 9-10 ¶¶ 19-20.

¹⁷ Motion to Strike at 10 ¶ 21.

¹⁸ Staff's Response at 6 ¶ 15.

Commission may determine a reasonable DNI to use for rate setting purposes.¹⁹ Staff also contends that several factual considerations support its argument that its testimony regarding the expense ratio methodology is within the proper scope of cross-answering testimony.²⁰ Staff maintains that its cross-answering testimony regarding the expense ratio methodology was a response to Staff's disagreement with PMSA's response testimony regarding and method for calculating DNI.²¹

- 10 Staff asserts that the Commission should reject PSP's argument that Staff's cross-answering testimony replaces its response testimony regarding DNI, because, while Staff's cross-answering testimony proposes a revised DNI recommendation, that recommendation is a product of further refinement of Staff's prior analysis regarding a range of reasonable DNI, not an entirely new analysis.²² Staff also argues that PSP should not be permitted to argue that a witness may not broadly engage with material from response testimony as part of cross-answering testimony because PSP's witnesses have similarly provided rebuttal testimony that is not specific to the arguments made by Staff and PMSA.²³
- 11 Staff contends that the Commission should reject PSP's argument that it is prejudiced by Staff's cross-answering testimony and decline the request to strike testimony and exhibits, particularly because pilotage is relatively new to regulation and the Commission benefits from a full record.²⁴ Staff asserts that its cross-answering testimony does not contradict its response testimony regarding DNI, but that it updates or modifies Staff's recommendation in a manner that is consistent with Staff's response testimony because Staff's revised DNI recommendation falls within the reasonable range of DNI in Staff's response testimony.²⁵ Staff further suggests that PSP had a meaningful opportunity to respond to Staff's revised DNI recommendation because PSP's witnesses have critiqued the lower end of Staff's DNI range and DNI recommendation in PSP's rebuttal testimony, and Staff's revised DNI recommendation is largely based on information

¹⁹ Staff's Response at 6 ¶ 16.

²⁰ Staff's Response at 6-7 ¶ 17 (identifying eight factual considerations in support of argument that Staff's testimony was within scope of cross-answering testimony).

²¹ Staff's Response at 6-8 ¶¶ 17-18.

²² Staff's Response at 8 ¶ 20.

²³ Staff's Response at 8-9 ¶ 21.

²⁴ Staff's Response at 9-10 ¶ 22.

²⁵ Staff's Response at 10 ¶ 23.

provided by PSP.²⁶ However, while Staff maintains that its cross-answering testimony is appropriate, it is nonetheless sensitive to PSP's procedural concerns and would not object to limited surrebuttal to address the expense ratio analysis.²⁷

- 12 Also on February 18, 2026, PMSA filed a Response in Opposition to Puget Sound Pilot's Motion to Strike Portions of Staff's Cross-Answering Testimony (PMSA's Response). PMSA argues that the portions of Staff's cross-answering testimony that PSP seeks to strike are within the proper scope of cross-answering testimony because it is responding to PMSA's testimony and refining Staff's analysis presented in its response testimony, rather than entirely replacing Staff's prior methodology.²⁸ PMSA further contends that the Commission generally prefers to include relevant information into the record, that Staff's cross-answering testimony regarding the expense ratio method is clearly relevant to the issue of determining a reasonable DNI, and that the Commission has previously allowed new information in rebuttal when the information was responsive to prior testimony.²⁹ PMSA asserts that PSP has not demonstrated that it is prejudiced by Staff's analysis in cross-answering testimony because Staff's analysis relies on PSP's own pilotage compensation survey data.³⁰
- 13 Rather than striking Staff's testimony, PMSA suggests that the Commission should consider Staff's cross-answering testimony regarding the expense ratio methodology and accord it the weight that it is due, in the interest of having a more developed record.³¹ PMSA further maintains that PSP had an opportunity to evaluate and respond to Staff's cross-answering testimony through discovery, at hearing as part of cross-examination, and in post hearing briefing.³² PMSA also states that it does not oppose giving PSP the opportunity to file surrebuttal testimony on the issue of Staff's expense ratio methodology.³³ Finally, PMSA contends that PSP's reliance on a prior Commission order

²⁶ Staff's Response at 10-11 ¶ 24.

²⁷ Staff's Response at 11 ¶ 25.

²⁸ PMSA's Response at 7-8 ¶¶ 20-25. *See also* PMSA's Response at 8 ¶ 27 (arguing that Staff's expense ratio analysis is responsive to both PMSA's DNI benchmarking analysis provided in Moore, Exh. MM-16 and to PMSA's critique of PSP's salary survey).

²⁹ PMSA's Response at 8-10 ¶¶ 26-30.

³⁰ PMSA's Response at 10-11 ¶¶ 31-33.

³¹ PMSA's Response at 11-12 ¶¶ 34-35.

³² PMSA's Response at 12-13 ¶¶ 36-39. *See also* PMSA's Response, Attachment A (containing discovery questions from PSP to Staff regarding Staff's expense ratio methodology).

³³ PMSA's Response at 13 ¶ 40.

striking rebuttal testimony in Avista's 2016 general rate case (GRC) is misplaced because the analysis in that case is specific to a utility's rebuttal testimony, rather than a responding party's cross-answering testimony such as Staff's.³⁴

- 14 On February 20, 2026, PSP filed a Motion for Leave to File Reply in Support of Motion to Strike (Motion for Leave). PSP argues that good cause exists for PSP to file a reply because Staff's cross-answering testimony regarding its expense ratio methodology is linked to the issue of determining a reasonable pilot DNI, which is a central and major issue in this proceeding.³⁵ PSP further asserts that a reply is warranted to respond to PMSA's implication that Staff's cross-answering testimony was responsive to PMSA's testimony and analysis.³⁶ PSP also contends that reply is warranted to respond to Staff's assertions that its expense ratio methodology was inspired by or in response to PMSA's testimony.³⁷

DISCUSSION AND DECISION

A. Motion to Revise

- 15 Washington Administrative Code (WAC) 480-07-460(1)(a)(i) requires a party to seek leave from the presiding officer by written motion in order to file revised pre-filed testimony or exhibits that include substantive changes. The party seeking leave to file substantive revisions must file the motion to make substantive changes as soon as practicable upon discovering the need to make those changes.³⁸ The Commission will grant a motion to revise testimony upon a showing a good cause, including whether the revisions will assist in the development of a complete record, and considering the prejudice to other parties.
- 16 Staff persuasively argues that it filed its Motion to Revise as soon as practicable after it learned of the error in its testimony and exhibits. The Commission determines that insofar as Staff's revisions seek to properly incorporate adjustments into its revenue requirement and other analysis that were in fact testified to by Staff, but not incorporated into its revenue requirement, the revision will not prejudice the other parties in this proceeding.

³⁴ PMSA's Response at 13-15 ¶¶ 41-46 (*citing WUTC v. Avista Corp.*, Dockets UE-160228 & UG-160229 (Consolidated), Order 04 (Octo. 10 2016)).

³⁵ Motion for Leave at 2-3 ¶ 8.

³⁶ Motion for Leave at 3 ¶ 9.

³⁷ Motion for Leave at 3 ¶ 10.

³⁸ WAC 480-07-460(1)(b).

The Commission also finds that having corrected information will ensure that the record is accurate, which will be of assistance to the Commission. Finally, as noted above, no party opposed Staff's Motion to Revise. Consequently, the Commission grants Staff's Motion to Revise.

B. Motion for Leave to Reply

17 WAC 480-07-370(5)(b) provides:

A party that wishes to reply to an answer or response must file a motion requesting permission to reply within five business days after the respondent serves the answer or response. The motion must explain why a reply is necessary including, but not necessarily limited to, whether the answer or response raises new facts or legal argument requiring a reply. A party should file a proposed reply as an attachment to its motion. The motion is deemed denied unless the commission grants the motion within five business days after the movant files it.

18 Unless invited by the Commission, replies should be used sparingly to address legal and factual issues that could not have been reasonably anticipated at the time of filing the initial motion, given that other parties generally have no opportunity to respond to a reply under the Commission's rules.³⁹

19 The Commission finds that PSP has not demonstrated good cause warranting reply because all of its arguments in support of its Motion for Leave were previously raised in its Motion to Strike. PSP argued in its Motion to Strike that pilot DNI accounts for almost two-thirds of PSP's revenue requirement, that "Staff could not have chosen a more significant issue on which to suddenly change position," and that "DNI is central to PSP's case."⁴⁰ Similarly, although PSP suggests that there is good cause to reply to Staff and PMSA's arguments that Staff's cross answering testimony was in response to PMSA's response testimony, PSP has already vigorously argued this in its Motion to Strike.⁴¹ The Commission is able to evaluate the credibility of Staff and PMSA's

³⁹ *WUTC v. DTG Enterprises, Inc.*, Docket TG-240761, Order 05 at 2 ¶ 8 fn. 4 (July 1, 2025).

⁴⁰ Motion to Strike at 8-9 ¶ 17-18.

⁴¹ Motion to Strike at 5 ¶ 10 ("Nowhere in Exhibit MM-16 is the term 'expense ratio' mentioned. PMSA never introduced or discussed an analysis of DNI compared to expenses, and it explicitly did not endorse the use of 'cherry-picked data from other pilotage grounds outside of the Pacific Northwest' to calculate DNI."). *See also* Motion to Strike at 8 ¶ 16 ("Staff's new 'expense ratio' methodology for determining DNI has never been raised before: not in Staff's response testimony, not in PMSA's response testimony, not in any past proceeding, and not in the Staff

arguments and will not find good cause for reply on the basis of arguments already presented in PSP's Motion to Strike. Consequently, the Commission denies PSP's Motion for Leave.

C. Motion to Strike

20 With respect to motions to strike testimony filed prior to the evidentiary hearing, the Commission has previously explained:

As a technical matter, motions to strike prefiled testimony are actually premature in the sense that prefiled testimony, by its nature, has not yet been offered into the record subject to objections by other parties. However, the Commission, following its practice of liberally construing pleadings, routinely considers and rules on such motions as a practical means of resolving disputes over the admissibility of evidence before a hearing commences. This is done in the interest of gaining efficiency in the hearing process by not forcing parties to prepare discovery and cross-examination with respect to testimony that is irrelevant or otherwise inadmissible on its face. In addition, early rulings excluding such evidence avoid the need to expend valuable hearing time considering and resolving disputes over such evidence.⁴²

21 WAC 480-07-495(1) further provides:

All relevant evidence is admissible if the presiding officer believes it is the best evidence reasonably obtainable, considering its necessity, availability, and trustworthiness. The presiding officer will consider, but is not required to follow, the rules of evidence governing general civil proceedings in nonjury trials before Washington superior courts when ruling on the admissibility of evidence.

The presiding officer may exclude evidence that is irrelevant, repetitive, or inadmissible, whether or not a party objects to the evidence. Parties objecting to the introduction of evidence must state the grounds for the objection at the time the evidence is offered. If the presiding officer excludes the evidence from the record, the presiding officer may provide the party offering that evidence with the opportunity to make an oral or

workshops held with the express purpose of refining the ratemaking process for pilotage. . . . Sevall's new idea seems to be spontaneously generated, without a genuine connection to any testimony submitted by PMSA.").

⁴² *WUTC v. Puget Sound Energy*, Dockets UT-170033 & UG-170034 (consolidated), Order 07 at 2 ¶ 5 (August 25, 2017).

written offer of proof briefly describing the nature and purpose of the evidence for subsequent review of the presiding officer's ruling.

22 The Commission thus has broad discretion to consider any evidence it deems relevant, and equally, to reject any evidence it deems irrelevant. At this junction, the Commission “need only determine whether any portion of [the challenged] testimony is so demonstrably irrelevant to the disputed issues that the Commission would not admit it into evidence if it were offered.”⁴³ However, the Commission has clearly stated that presenting new proposals and information as part of cross-answering or rebuttal testimony is disfavored, as it may prejudice other parties.⁴⁴

23 After carefully considering the record, challenged testimony, and exhibits, the Commission finds that Staff’s testimony and exhibits are within the proper scope of cross-answering testimony, albeit narrowly. The Commission agrees with Staff and PMSA that Staff’s expense ratio analysis represents a refinement of Staff’s initial testimony regarding a reasonable range of DNI based on a comparison to other pilotage districts, rather than an entirely new or contradictory proposal. Although PMSA did not testify to an expense ratio analysis, it did present an analysis with respect to the ratio between the salaries of PSP pilots and WSF Masters. Staff’s analysis draws on the principles of PMSA’s analysis as part of Staff’s response to PMSA’s proposed method for determining DNI.⁴⁵ In this sense, Staff’s cross-answering testimony regarding an expense ratio is a response to PMSA’s proposal that the Commission continue to use a historical average of DNI to set an DNI and PMSA’s proposal that the Commission consider the ratio between PSP pilot and WSF Master salaries as a basis to evaluate a reasonable DNI.

24 Moreover, each party to this proceeding has suggested that the Commission could use this case to establish a “benchmark” regarding DNI.⁴⁶ To the extent that this case

⁴³ *WUTC v. Puget Sound Pilots*, Docket TP-190976, Order 06 at 2-3 ¶ 9 (July 21, 2020).

⁴⁴ *WUTC v. Avista Corp.*, Dockets UE-160228 & UG-160229 (Consolidated), Order 04 at 5 ¶ 12 (Octo. 10 2016); *WUTC v. Puget Sound Pilots*, Docket TP-190976, Order 08 at 7 ¶ 23 (Aug. 7, 2020).

⁴⁵ Sevall, Exh. SS-8T at 4:17 – 6:2.

⁴⁶ Carlson, Exh. IC-16T at 10:14-18 (“Mr. Sevall’s remarks also informed PSP’s decision to commission the UPC Pilot Compensation Study. Those remarks gave PSP a reasonable expectation that the Commission would consider benchmarking evidence that is transparent, replicable, and directed to the question Mr. Sevall posed: what is a fair rate for pilot compensation.”); Sevall, Exh. SS-8T at 9:18-19 (“Staff recommends that the Commission set its DNI decision as a benchmark and dictate the way the DNI benchmark will be updated for the

presents a novel issue, whether the Commission should establish a benchmark for pilot DNI that will inform future pilotage rate cases, the Commission prefers to err on including, rather than excluding, testimony that will aid the Commission's evaluation of this issue, and will "thus accord weight to the testimony and evidence in lieu of excluding it entirely."⁴⁷ As Staff's cross-answering testimony is directly related to its revised recommendation regarding a reasonable range of DNI and per pilot DNI, the Commission prefers to include that testimony and analysis to inform the Commission's evaluation of the pilot DNI issue and afford it due weight.

25 The cases cited by PSP in its Motion to Strike do not compel a conclusion that Staff's cross-answering testimony must be stricken. In one case, while the Commission did express disapproval at the utility's decision to present an alternative rate design proposal until rebuttal, and stated its expectation that the utility would present its proposal as part of its direct case in the future, the Commission nonetheless considered the utility's alternative proposal and rejected it on the merits.⁴⁸ With respect to the motion to strike the alternative proposal for deferred accounting in Avista's 2016 GRC, that case involved additional circumstances that are not present in this matter. As the Commission observed in that case:

Avista's final argument that the Commission would somehow be deprived of a constructive alternative is wide of the mark. Indeed, the Commission discussed in its final order in Dockets UE-150204 and UG-150205 that "[i]f the Company decides to procure a new metering system, it may file a well-supported accounting petition on a timely basis to avoid a write-off." While this referred to Avista's request for deferred accounting for its net investment in meters that would be replaced as part of the AMI implementation, the discussion, and other discussion in Order 05, is equally applicable to the costs belatedly proposed for deferred accounting treatment in this general rate case.⁴⁹

26 In the case concerning Avista, the Commission had provided express prior guidance that Avista could file an accounting petition concerning costs associated with its meter investments in the previous rate case, such that Avista could not reasonably claim that it

next five years."); Moore, Exh. MM-49T at 32:1-2 ("PMSA agrees that establishing a clear benchmark for DNI would provide regulatory efficiency.").

⁴⁷ *WUTC v. Puget Sound Pilots*, Docket TP-190976, Order 06 at 4-5 ¶ 17 (July 21, 2020).

⁴⁸ *WUTC v. Puget Sound Power & Light Co.*, Dockets U-89-2688-T & U-89-2955-T, Third Supplemental Order at 75-79 (Jan. 1990).

⁴⁹ *WUTC v. Avista Corp.*, Dockets UE-160228 & UG-160229 (Consolidated), Order 04 at 5 ¶¶ 13 (Octo. 10 2016) (internal citations omitted).

could not have anticipated a deferred accounting proposal that it sought to introduce in rebuttal. Here, there is no such prior guidance from the Commission regarding the need for Staff to file a specific proposal as part of its direct case. While the Commission adheres to its prior direction that all parties should refrain from introducing new proposal or information as part of rebuttal or cross-answering testimony, the Commission finds that excluding them would deprive the Commission of a potentially constructive alternative on an issue that may set precedent for pilot rate setting in future cases.

27 In sum, the Commission determines that Staff's testimony and exhibits regarding its proposed expense ratio methodology is sufficiently responsive to PMSA's testimony and, while Staff should have provided its alternative in its response testimony, the Commission elects to consider Staff's analysis and afford it due weight in lieu of exclusion. However, the Commission is concerned that PSP would not have been able to reasonably anticipate Staff's proposal, such that PSP was not able to directly respond to it as part of its rebuttal testimony. To ensure that PSP can reasonably address Staff's proposed methodology, and given Staff and PMSA's lack of objection, the Commission authorizes PSP to file limited surrebuttal on the issue of Staff's proposed methodology. While there is limited time prior to the hearing in this matter, the Commission is confident that PSP will be able to respond in pre-filed testimony, considering that PSP has already engaged in discovery regarding Staff's proposed methodology.⁵⁰ While extraordinary, authorizing surrebuttal on the limited issue of Staff's proposed methodology will mitigate any potential prejudice to PSP and will serve to more fully develop the record on the important issue of DNI.

28 Consequently, the Commission denies PSP's Motion to Strike in part with respect to its request to strike Staff's testimony and exhibits, and grants PSP's Motion to Strike in part with respect to the request for surrebuttal testimony. Surrebuttal testimony shall be filed no later than 5:00 PM, Friday, March 6, 2026.

ORDER

29 The Commission grants Staff's Motion to Revise.

30 The Commission denies PSP's Motion for Leave to Reply.

31 The Commission denies PSP's Motion to Strike with respect to the request to strike Staff's testimony and exhibits and grants PSP's Motion to Strike with respect to the

⁵⁰ PMSA's Response, Attachment A (containing discovery requests from PSP to Staff concerning Staff's expense ratio analysis).

request for surrebuttal testimony. Surrebuttal testimony shall be filed no later than 5:00 PM, Friday, March 6, 2026.

DATED at Lacey, Washington, February 27, 2026.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Harry Fukano_____

HARRY FUKANO

Administrative Law Judge

NOTICE TO PARTIES: This is an Interlocutory Order of the Commission. Administrative review may be available through a petition for review, filed within 10 days of the service of this Order pursuant to WAC 480-07-810.