

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of
PUGET SOUND ENERGY, Inc.

For an Accounting Order Authorizing
Accounting Treatment Related to Payments
for Major Maintenance Activities

Docket No. UE-130583

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,
Complainant,

v.

PUGET SOUND ENERGY, INC.,
Respondent.

Docket No. UE-130617

**PUGET SOUND ENERGY, INC'S
MOTION TO STRIKE TESTIMONY
AND EXHIBITS OF SEBASTIAN
COPPOLA**

In the Matter of the Petition of
PUGET SOUND ENERGY, Inc.

For an Accounting Order Authorizing the
Sale of the Water Rights and Associated
Assets for the Electron Hydroelectric Project
in Accordance with WAC 480-143 and
RCW 80.12.

Docket No. UE-131099

In the Matter of the Petition of
PUGET SOUND ENERGY, Inc.

For an Accounting Order Authorizing the
Sale of Interests in the Development Assets
Required for the Construction and Operation
of Phase II of the Lower Snake River Wind
Facility

Docket No. UE-131230

I Puget Sound Energy, Inc. ("PSE"), by and through its undersigned counsel, hereby moves to strike the response testimony and exhibits of Sebastian Coppola, filed on behalf of the Washington Attorney General's Office, Public Counsel Section ("Public Counsel"), which relate to revisions to the Power Cost Adjustment ("PCA") mechanism. Such

MOTION TO STRIKE - 1

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testimony and exhibits should be stricken because they are outside the scope of issues presented in this power cost only rate case ("PCORC"). The Commission rule at issue is WAC 480-07-375(1)(d) (motions to strike).

INTRODUCTION

2 Witness Sebastian Coppola filed response testimony on behalf of Public Counsel on August 14, 2013, in which he testifies regarding the PCA mechanism, specifically, "whether it is functioning as intended, is no longer needed, or should be modified to better accomplish the intended results".¹ This is the sole issue on which Mr. Coppola testifies, and it is outside the scope of a PCORC proceeding. Accordingly, PSE now moves to strike Public Counsel's testimony and exhibits.

DISCUSSION

3 Public Counsel has proposed substantial modifications to the PCA mechanism, an issue that was not raised by PSE in this proceeding, and which is outside the scope of a PCORC proceeding. The PCORC is one part of the PCA mechanism, and is intended to be a streamlined and simplified filing. As such, a PCORC proceeding is not an appropriate forum in which to propose modifications, revisions or elimination of the PCA mechanism.

4 The purpose of a PCORC is "have regulatory processes that would enable the Company to deal effectively with the financial pressures associated with dynamic market prices and to bring new resources into PSE's power portfolio."² Accordingly, the PCORC is

¹ Coppola, Exh. No. SC-1T, 3:8-9.

² Docket UE-072300, Order 13 at ¶13 (Jan. 15, 2009).

a limited, expedited, and streamlined filing, made to update power costs and bring in new generation resources. Public Counsel's proposal to review the entire PCA mechanism is clearly outside the scope of this proceeding. See pages 19 through 21 of the prefiled rebuttal testimony of Mr. David E. Mills, Exhibit No. ____ (DEM-8CT), for more information regarding the inappropriateness of Public Counsel's proposal.

5 The Commission has stated that one of the key advantages of the PCORC process is the ability to consider issues on an expedited basis.³ To that end, the Commission approved a six-month expedited rate proceeding.⁴ The time remaining in this PCORC proceeding does not allow for sufficient consideration of Public Counsel's proposal, nor does it provide an opportunity for other parties to fully respond to Public Counsel's proposal. Therefore, the Commission should reject Public Counsel's invitation to modify or eliminate the PCA mechanism and strike all testimony and exhibits related to such.

CONCLUSION

6 The Commission should strike all testimony and exhibits by Public Counsel witness Sebastian Coppola relating to a review of the PCA mechanism because it is outside the scope of this PCORC proceeding.

³³ *Id.* at ¶43.

⁴ *Id.*

Respectfully submitted this 28th day of August, 2013.

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