

**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
SUPPLEMENTAL TESTIMONY AND
EXHIBITS

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the supplemental prefiled direct testimony and exhibits submitted with this motion. The purpose of these revisions is to update the original testimony and exhibits of David Mills, Karl Karzmar, John Story and James Heidell for information that was not available to PSE at the time it filed its original direct testimony on February 15, 2006. Please note that the testimony of James Heidell is updated by the testimony of Mr. David W. Hoff, who adopts Mr. Heidell's prefiled direct testimony and then supplements it.

2 A primary driver of the need to file supplemental testimony is the recent update of PSE's PCA Mechanism power cost baseline rate as of July 1, 2006, consistent with the Commission's June 29, 2006 order in Docket Nos. UE-050870 and UE-060783. PSE advised the Commission

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and the parties at the time of its original filing that it would need to update its electric revenue deficiency and related information after the updated power cost baseline rate was known in order to take into account the revenues from that update.

3 This supplemental testimony also generally updates PSE's power cost projections for the rate year as well as various adjustments PSE had proposed to test year figures based on more recent data than the information PSE had available to it when it prepared its original filing.

4 Accordingly, PSE is filing with this motion the following prefiled supplemental direct testimony and exhibits:

- Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-15T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-16);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-17);
- Third Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-18);
- Prefiled Supplemental Direct Testimony of Karl R. Karzmar, Exhibit No. ___(KRK-8T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Karl R. Karzmar, Exhibit No. ___(KRK-9);

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- Second Exhibit to the Prefiled Supplemental Direct Testimony of Karl R. Karzmar, Exhibit No. ____ (KRK-10);
- Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ____ (JHS-15T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ____ (JHS-16);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ____ (JHS-17);
- Third Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ____ (JHS-18);
- Prefiled Direct Testimony of David W. Hoff, Exhibit No. ____ (DWH-1T)
- First Exhibit to the Prefiled Direct Testimony of David W. Hoff, Exhibit No. ____ (DWH-2);
- Second Exhibit to the Prefiled Direct Testimony of David W. Hoff, Exhibit No. ____ (DWH-3);
- Third Exhibit to the Prefiled Direct Testimony of David W. Hoff, Exhibit No. ____ (DWH-4); and
- Fourth Exhibit to the Prefiled Direct Testimony of David W. Hoff, Exhibit No. ____ (DWH-5).

5 The Commission's procedural rules require PSE to seek leave for filing its proposed supplemental direct testimony and exhibits 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.

6 PSE's motion should be granted. PSE seeks to add to the record supplemental evidence that will more accurately reflect PSE's projected power costs and electric and gas revenue deficiency. PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand the required changes from PSE's prefiled direct evidence. Allowing PSE to supplement its evidence now will reduce the burden on other parties that would result from having to attempt to update or correct PSE's original filing themselves based on information made available to them in data request responses. Submission of the supplemental testimony at this time also provides the other parties the opportunity to address the updated information in their response testimonies (due July 19, 2006), which would not be possible if PSE first provided this information in PSE's rebuttal testimony. Finally, PSE believes that the other parties to this proceeding are already aware of the substance of the changes made in the supplemental direct testimony, and thus will be neither surprised nor disadvantaged by this filing.

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

DATED: July 7, 2006

Respectfully Submitted,

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