



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

July 12, 2006

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *Puget Sound Energy General Rate Case*
Docket Nos. UE-060266 and UG-060267 Consolidated

Dear Ms. Washburn:

Enclosed for filing in the above-referenced docket are the original and 16 copies of the Joint Response to Motion for Leave to File Supplemental Testimony and Motion for Extension of Time to File Response Testimony (July 25, 2006), and Certificate of Service.

Sincerely,

ROBERT D. CEDARBAUM
Senior Counsel

Enclosures
RDC:kll
cc: Parties



**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UE-060266
)	
Complainant,)	
v.)	JOINT RESPONSE TO MOTION FOR
)	LEAVE TO FILE SUPPLEMENTAL
)	TESTIMONY AND MOTION FOR
)	EXTENSION OF TIME TO FILE
PUGET SOUND ENERGY, INC.,)	RESPONSE TESTIMONY (JULY 25,
)	2006)
Respondent.)	
<hr/>)

1 Pursuant to the Washington Utilities and Transportation Commission Notice, dated July 10, 2006, and WAC § 480-07-385, the Staff of the Commission, the Industrial Customers of Northwest Utilities (“ICNU”) and Public Counsel (collectively, the “Moving Parties”) hereby respond to Puget Sound Energy’s (“PSE” or the “Company”) Motion for Leave to File Supplemental Testimony and Exhibits. The Moving Parties do not object to PSE’s Motion, provided that the Commission grant an extension of time of four business days, from July 19, 2006 to July 25, 2006, for Staff, Public Counsel, and intervenors to submit response testimony and exhibits in the above-captioned proceeding upon the conditions set forth in item 2 below. In support of their request, the Moving Parties state as follows:

2 1. On July 10, 2006, the Company filed with the Commission a Motion for Leave to File Supplemental Testimony and Exhibits. The Company's Motion states that the supplemental testimony and exhibits reflect the July 1, 2006, update of its Power Cost Adjustment (“PCA”) Mechanism power cost baseline rate, consistent with the

Commission's June 29, 2006, order in Docket Nos. UE-050870 and UE-060783. The Company's Motion also states that the supplemental testimony updates PSE's power cost projections for the rate year.¹

3 2. The Moving Parties have conferred with other parties to this proceeding, including PSE, and have reached agreement on the following process regarding the Company's Motion:

- the Company's Motion should be granted by the Commission.
- On July 19, 2006, Staff, Public Counsel and intervenors will provide the Company and each other electronically by 4:00 p.m. and with overnight delivery of hard copies the next day, final and complete copies of their response testimony and exhibits on issues that are not related to power costs and the PCA. The Company may then begin discovery on that material and will also receive copies of the parties' underlying workpapers for that material on July 21, 2006. A courtesy copy of the July 19th materials will also be provided to Administrative Law Judge Dennis Moss.
- On July 25, 2006, Staff, Public Counsel and intervenors will file with the Commission and serve on the Company and each other their response testimony and exhibits on *all* issues electronically by 4:00 p.m. with overnight delivery of hard copies the next day. Using the same delivery

¹ For example, Mr. Mills explains that the Company is providing a new Aurora power cost model run that is based on a new resource data set obtained from the Aurora vendor. Exhibit No. (DEM-15T) at 4. In addition, the Company has updated forward gas prices, as well as fixed-price gas and electric supply contracts in place for the rate year. *Id.* at 5. There also are updates to coal prices, Mid-C power contract prices, transmission costs, and Production O&M Costs. *Id.* at 5-8.

process, the parties will also provide the Company copies of underlying workpapers not already provided on July 21, 2006.

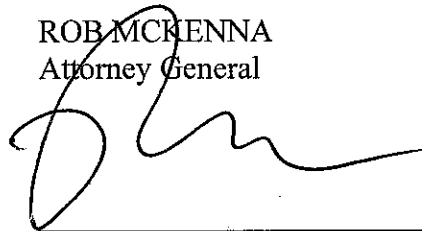
4 3. The updates proposed by PSE to its power cost projections require additional time for other parties to prepare their response testimony on issues related to power costs and the PCA. Good cause, therefore, exists for the Commission to grant an extension of time for the filing of response testimony because it will allow Staff, Public Counsel, and intervenors to adequately respond to supplemental testimony and exhibits that PSE filed on July 10, 2006. Delaying the formal filing of all response testimony and exhibits until July 25, 2006, will be more convenient administratively for the Commission and will not prejudice the Company, which will have earlier access to response cases that do not address power costs and the PCA.

5 WHEREFORE, Staff, ICNU and Public Counsel respectfully request that the Commission grant this Motion for Extension of Time.

Dated this 12th day of July, 2006.

Respectfully submitted,

ROB MCKENNA
Attorney General

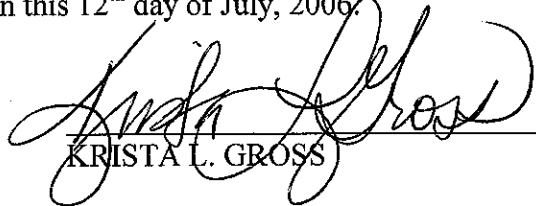


ROBERT D. CEDARBAUM
Senior Counsel
Counsel for Washington Utilities and
Transportation Commission Staff

Docket Nos. UE-060266/UG-060267
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 12th day of July, 2006.


KRISTA L. GROSS

For Puget Sound Energy:

Kirstin S. Dodge
Jason Kuzma
Perkins Coie LLP
10885 NE Fourth Street, Suite 700
Bellevue, WA 98004-5579
Fax: (425) 635-2400
Phone: (425) 635-1400
E-mail: kdodge@perkinscoie.com
jkuzma@perkinscoie.com

For ICNU:

S. Bradley Van Cleve
Matthew W. Perkins
Irion Sanger
Davison Van Cleve PC
333 SW Taylor, Suite 400
Portland, OR 97204
Fax: (503) 241-8160
Phone: (503) 241-7242
E-mail: mail@dvclaw.com

For Public Counsel:

Simon ffitich
Public Counsel Section
Office of the Attorney General
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012
Fax: (206) 389-2085
Phone: (206) 464-7744
E-mail: simonf@atg.wa.gov

For The Kroger Co.:

Michael L. Kurtz
Boehm Kurtz & Lowry
36 E Seventh St Suite 1510
Cincinnati, Oh 45202
Phone: (513) 421-2255
Fax: (513) 421-2764
E-mail: mkurtzlaw@bkllawfirm.com

For Cogeneration Coalition of Wash.:

Michael P. Alcantar
Donald Brookhyser
Alcantar & Kahl LLP
1300 S.W. Fifth, Suite 1750
Portland, OR 97201
Fax: (503) 402-8882
Phone: (503) 402-9900
E-mail: mpa@a-klaw.com
deb@a-klaw.com

For Northwest Energy Coalition:

Nancy Hirsch
Danielle Dixon
219 1st Avenue South, Suite 100
Seattle, WA 98104
Fax: (206) 621-0097
Phone: (206) 621-0094
Email: nancy@nwenergy.org
danielle@nwenergy.org

For The Energy Project:

Ronald L. Roseman
Attorney at Law
2011 14th Avenue East
Seattle, WA 98112
Fax: (206) 568-0138
Phone: (206) 324-8792
E-mail: ronaldroseman@comcast.net

For NWIGU:

Edward Finklea
Chad M. Stokes
Cable Houston Benedict
Haagensen & Lloyd LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136
Fax: (503) 224-3176
Phone: (503) 224-3092
E-mail: efinklea@chbh.com
cstokes@chbh.com

For Federal Executive Agencies:

Norman Furuta
Rita M. Liotta
Associate Counsel
Department of the Navy
2001 Junipero Serra Blvd., Suite 600
Daly City, CA 94014-3890
Fax: (650) 746-7372
Phone: (650) 746-7312 (Furuta)
(650) 746-7311 (Liotta)
E-mail: norman.furuta@navy.mil
rita.liotta@navy.mil

For Seattle Steam Company:

Elaine L. Spencer
Graham & Dunn PC
Pier 70
2801 Alaskan Way, Suite 300
Seattle, WA 98121
Fax: ()
Phone: (206) 624-8300
E-mail: espencer@grahamdunn.com