

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-090704

Docket No. UG-090705

PUGET SOUND ENERGY, INC.'S
MOTION FOR LEAVE TO FILE
SUPPLEMENTAL AND REVISED
TESTIMONY AND EXHIBITS

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(1)(b)(ii), Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission grant it leave to file the prefiled supplemental and revised direct testimony and exhibits submitted with this motion. The purpose of this supplemental and revised evidence is to update the prefiled direct testimony and certain exhibits of Janet K. Phelps, Michael J. Stranik and Eric M. Markell to correct for an error in the treatment of revenues associated with the lease for the Everett Delta Project ("Everett Delta"). These revenues should have been removed from the test year to be consistent with the treatment of Everett Delta in PSE's 2007 general rate case, Docket No. UG-072301 ("2007 GRC").

2 PSE filed its prefiled direct evidence in this general rate case proceeding on May 8, 2009. After filing its direct testimony and exhibits, PSE became aware that the Everett Delta lease revenues had not been removed from the test year. In this supplemental filing, PSE has made changes to the pro forma and restating adjustments to correct this error and remove the lease revenues from the test year. This change to the pro forma and restating adjustments results in an

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adjustment to the Company's total revenue deficiency from \$27,199,177 set forth in PSE's May 8, 2009 filing to \$30,408,378 in this supplemental filing. The percentage rate increase changed from 2.2% in the original filing to 2.5% in this supplemental filing. The change to the revenue requirement has resulted in a change to the cost of service study. Accordingly, PSE requests permission to file the following supplemental and revised testimony and exhibits:

- Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-16T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-17);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-18);
- Third Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-19);
- Fourth Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-20);
- Fifth Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-21);
- Sixth Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-22);
- Seventh Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-23);
- Eighth Exhibit to the Prefiled Supplemental Direct Testimony of Janet K. Phelps, Exhibit No. ___(JKP-24);
- Prefiled Supplemental Direct Testimony of Michael J. Stranik, Exhibit No. ___(MJS-8T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Michael J. Stranik, Exhibit No. ___(MJS-9);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of Michael J. Stranik, Exhibit No. ___(MJS-10);
- Third Exhibit to the Prefiled Supplemental Direct Testimony of Michael J. Stranik, Exhibit No. ___(MJS-11); and

- Revisions to the Prefiled Direct Testimony of Eric M. Markell, Exhibit No. ___ (EMM-1CT).

3 The Commission's procedural rules require PSE to seek leave for filing its proposed revisions 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.

4 PSE's motion should be granted. PSE seeks to supplement evidence that will more accurately reflect PSE's gas revenue deficiency for the period that rates will be in effect at the conclusion of this proceeding. PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand the changes that are required. Allowing these changes now will reduce the burden on PSE witnesses and other parties that would otherwise result from addressing these discrepancies in data request responses or rebuttal testimony. Submission of the supplemental testimony early in this proceeding provides the other parties ample opportunity to engage in discovery regarding the updated information prior to formulating their response testimony (due November 17, 2009). Therefore, the parties to this proceeding will not be disadvantaged by this filing.

5 The Commission has expressed the importance of having a full and accurate record upon which to base its decisions. In PSE's 2007 GRC, PSE was granted leave to file supplemental testimony. (*See* Order 08, dated May 5, 2008.) The Order stated:

The Commission's paramount interest is in having a full record with the best available evidence upon which to base its decisions. When the Company offers supplemental evidence, as here, the Commission balances

its interest in having up-to-date information against the needs of the parties to have adequate opportunities for discovery and the development of their own testimony and exhibits....

Order 08 at ¶10. PSE believes that this request to supplement its filing will allow for “a more orderly process and will promote fairness.” (*See id.* at ¶9)

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

DATED: August 3, 2009

Respectfully Submitted,

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