

**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 TESTIMONY

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 direct testimony submitted with this motion. The purpose of this evidence is to explain the correction of errors in the portfolio screening model ("PSM") supporting the resource acquisition analysis used in this proceeding and to provide updated analysis results. The PSM was provided as workpapers supporting the Prefiled Direct Testimony of W. James Elsea, Exhibit No. ___(WJE-1HCT). PSE is also submitting the corrected workpapers with Mr. Elsea's supplemental testimony.

2 PSE filed its prefiled direct evidence in this general rate case proceeding on May 8, 2009. PSE has since identified one model error and one model inconsistency in its PSM. The model error resulted in an incorrect baseline portfolio cost, and correcting the modeling error improves the portfolio benefit metrics of all tested resources. The modeling inconsistency occurred because of a problem in replicating the extremely large PSM model. Neither the modeling errors

nor the model inconsistency caused a material change in the levelized cost of any resource.

Accordingly, PSE requests permission to file the Prefiled Supplemental Direct Testimony of W.

James Elsea, Exhibit No. ___(WJE-20CT);

3 The Commission's procedural rules require PSE to seek leave for filing its proposed testimony because it goes 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 to correct errors that are minor in effect but are necessary to accurately support PSE's resource acquisition analysis. 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 the corrected workpapers in data request responses or rebuttal testimony.

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

DATED: August 25 2009

Respectfully Submitted,

PERKINS COIE LLP



Sheree S. Carson, WSBA #25349

Donna L. Barnett, WSBA #36794

Attorneys for Puget Sound Energy, Inc.