

#### Rob McKenna

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August 27, 2009

David W. Danner, Executive Director and Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW P. O. Box 47250 Olympia, Washington 98504-7250

RE: WUTC v. Puget Sound Energy, Inc. (2009 General Rate Case)

Dockets UE-090704/UG-090705

Dear Mr. Danner:

Enclosed for filing in the above-referenced docket are the original and 16 copies of the Commission Staff Response to Puget Sound Energy, Inc.'s Motion for Leave to File Supplemental Testimony, and Certificate of Service.

Sincerely,

ROBERT D. CEDARBAUM Assistant Attorney General

RDC:klg Enclosures cc: Parties



### BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

1

2

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKETS UE-090704 and UG-090705 (consolidated)

COMMISSION STAFF RESPONSE TO PUGET SOUND ENERGY, INC.'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY

By motion dated August 25, 2009, Puget Sound Energy, Inc. ("the Company") requests permission to file supplemental direct testimony of Mr. W. James Elsea. The Company asserts that the sole purpose of the supplemental testimony is to explain the correction of errors in the portfolio screening model supporting the resource acquisition analysis used in this proceeding and the effect of these corrections on the analysis results.

Commission Staff does not object to the Company's motion. However, Staff reserves the right to object to the admission of Mr. Elsea's supplemental testimony, including an objection if the testimony goes beyond the mere correction of errors and, instead, constitutes improper updates or injects new issues that Staff could not reasonably and fairly evaluate under the current procedural schedule.

DATED this 27<sup>th</sup> day of August, 2009.

Respectfully submitted,

ROBERT M. MCKENNA

Attorney General

ROBERT D. CEDARBAUM
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

RESPONSE TO PSE MOTION FOR LEAVE TO FILE TESTIMONY- 1

# Dockets UE-090704/UG-090705 CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached 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 27th day of August.

**HC=Highly Confidential** 

C=Confidential

NC=Non-Confidential

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