**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|  |  |
| --- | --- |
| In the Matter of the Petition of  PUGET SOUND ENERGY, INC.  for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc. and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services | Docket No. UG-151663  Puget Sound Energy, Inc.’s Motion to Amend Prefiled Direct Testimony and Supporting Exhibits |

On August 11, 2015, Puget Sound Energy, Inc. (“PSE”) filed with the Washington Utilities and Transportation Commission (“Commission”) a Petition for Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc., and a Declaratory Order Approving the Methodology for Allocating Costs between Regulated and Non-regulated Liquefied Natural Gas Services (“Petition”). Concurrent with the filing of the Petition, PSE filed a Motion for Amended Protective Order with Highly Confidential Provisions.

Confidential per WAC 480-07-160

**REDACTED VERSION**

**REDACTED VERSION**

**REDACTED VERSION**

Confidential per WAC 480-07-160

**REDACTED VERSION**

**REDACTED VERSION**

**REDACTED VERSION**

In its filing, PSE marked the following prefiled direct testimony and supporting exhibits with the “highly confidential” designation:

* the Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-1HCT);
* the Third Exhibit to the Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-4HC);
* the Second Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-3HC);
* the Third Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-4HC);
* the Second Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-3HC); and
* the Third Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-4HC).

As stated in PSE’s Motion for Amended Protective Order with Highly Confidential Provisions, the release of “highly confidential” information to experts for Commission Staff or Public Counsel, or to any other parties who intervene in Docket No. UG-151633 would be subject to a showing that such persons or entities are not current or potential suppliers or purchasers of LNG for vehicular fuel or industrial end uses.

Subsequent to the filings on August 11, 2015, the Commission’s regulatory staff (“Staff”), the Public Counsel Unit of the Washington Attorney General’s Office (“Public Counsel”), and the Northwest Industrial Gas Users (“NWIGU”) have indicated an interest in participating in or filed a motion to intervene in this proceeding and have identified those consultants who will be assisting in the proceeding. The Commission also issued a protective order with highly confidential provisions.[[1]](#footnote-1)

PSE has now had a chance to review the parties to the proceeding and their designated consultants assisting in this proceeding. It does not appear to PSE that such entities or persons are current or potential suppliers or purchasers of LNG for vehicular fuel or industrial end uses. PSE has therefore notified each of Staff, Public Counsel, and NWIGU that the “highly confidential” provisions would no longer be necessary in this proceeding and would redesignate those materials previously marked as “highly confidential” as “confidential”.

Pursuant to WAC 480-07-460(1)(b), PSE requests leave from the Commission to redesignate the following prefiled direct testimony and supporting exhibits as “confidential”:

* the Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-1CT);
* the Third Exhibit to the Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-4C);
* the Second Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-3C);
* the Third Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-4C);
* the Second Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-3C); and
* the Third Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-4C).

Additionally, the following prefiled direct testimony and supporting exhibits refer to one or more of the above-referenced testimonies and supporting exhibits. Therefore, PSE also seeks leave, pursuant to WAC 480-07-460(1)(b), to correct references in the following prefiled direct testimonies and supporting exhibits to materials that are being redesignated from “highly confidential” to “confidential”:

* the Prefiled Direct Testimony of Roger Garratt, Exhibit No. \_\_\_(RG-1CT);
* the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-1T);
* the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-1T);
* the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-1T);
* the Eighth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-9C);
* the Ninth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-10C);
* the Tenth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-11C); and
* the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit No. \_\_\_(JAP-1T).

PSE has made no revisions to these prefiled direct testimonies and supporting exhibits other than to redesignate as “confidential” that information previously designated as “highly confidential” and to make revisions to other prefiled direct testimonies and supporting exhibits that referred to these redesignated materials.

For the reasons set forth above, PSE respectfully seeks leave to correct the following prefiled direct testimonies and supporting exhibits:

* proposed revisions to pages 4, 6, and 45 of the Prefiled Direct Testimony of Roger Garratt, Exhibit No. \_\_\_(RG-1CT);
* a proposed revised Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-1CT);
* a proposed revised Third Exhibit to the Prefiled Direct Testimony of Clay Riding, Exhibit No. \_\_\_(CR-4C);
* proposed revisions to pages 2 and 3 of the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-1T);
* a proposed revised Second Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-3C);
* a proposed revised Third Exhibit to the Prefiled Direct Testimony of Melissa F. Bartos, Exhibit No. \_\_\_(MFB-4C);
* proposed revisions to page 2 of the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-1T);
* a proposed revised Second Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-3C);
* a proposed revised Third Exhibit to the Prefiled Direct Testimony of Harold “Skip” York, Exhibit No. \_\_\_(HSY-4C);
* proposed revisions to pages 6, 15, 17, 18 and 19 of the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-1T);
* a proposed revised Eighth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-9C);
* a proposed revised Ninth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-10C);
* a proposed revised Tenth Exhibit to the Prefiled Direct Testimony of Susan E. Free, Exhibit No. \_\_\_(SEF-11C); and
* proposed revisions to pages 2, 3, 11, 12 and 19 of the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit No. \_\_\_(JAP-1T).

Concurrent with this Motion, PSE has filed proposed revised versions of these prefiled direct testimonies and supporting exhibits.

Dated this 23rd day of September, 2015

|  |  |
| --- | --- |
|  | **Perkins Coie LLP**  By: */s/ Jason Kuzma*  Jason Kuzma, WSBA No. 31830  Pamela Anderson, WSBA #37272 The PSE Building 10885 N.E. Fourth Street, Suite 700 Bellevue, WA 98004-5579  Telephone: 425.635.1400  Facsimile: 425.635.2400  Email [jkuzma@perkinscoie.com](mailto:jkuzma@perkinscoie.com)  [pjanderson@perkinscoie.com](mailto:pjanderson@perkinscoie.com)  Attorneys for Puget Sound Energy, Inc. |

1. *In the Matter of Petition of Puget Sound Energy, Inc. for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc., and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services*, Order 02 Protective Order with “Highly Confidential” Provisions, Docket UG-151663 (Sept. 9, 2015). [↑](#footnote-ref-1)