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**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

1. 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.

Puget Sound Energy, Inc.’s  
Motion to Amend Prefiled Direct  
Testimony and Supporting Exhibits

**Perkins Coie LLP**  
The PSE Building  
10885 N.E. Fourth Street, Suite 700  
Bellevue, WA 98004-5579  
Phone: 425.635.1400  
Fax: 425.635.2400

1           2.       In its filing, PSE marked the following prefiled direct testimony and  
2  
3 supporting exhibits with the “highly confidential” designation:  
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- 5           •       the Prefiled Direct Testimony of Clay Riding, Exhibit  
6                No. \_\_\_\_ (CR-1HCT);
- 7  
8           •       the Third Exhibit to the Prefiled Direct Testimony of Clay  
9                Riding, Exhibit No. \_\_\_\_ (CR-4HC);
- 10  
11           •       the Second Exhibit to the Prefiled Direct Testimony of  
12                Melissa F. Bartos, Exhibit No. \_\_\_\_ (MFB-3HC);
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14           •       the Third Exhibit to the Prefiled Direct Testimony of  
15                Melissa F. Bartos, Exhibit No. \_\_\_\_ (MFB-4HC);
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17           •       the Second Exhibit to the Prefiled Direct Testimony of  
18                Harold “Skip” York, Exhibit No. \_\_\_\_ (HSY-3HC); and
- 19  
20           •       the Third Exhibit to the Prefiled Direct Testimony of  
21                Harold “Skip” York, Exhibit No. \_\_\_\_ (HSY-4HC).
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27 As stated in PSE’s Motion for Amended Protective Order with Highly Confidential  
28 Provisions, the release of “highly confidential” information to experts for Commission Staff  
29 or Public Counsel, or to any other parties who intervene in Docket No. UG-151633 would  
30 be subject to a showing that such persons or entities are not current or potential suppliers or  
31 purchasers of LNG for vehicular fuel or industrial end uses.  
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35           3.       Subsequent to the filings on August 11, 2015, the Commission’s regulatory  
36 staff (“Staff”), the Public Counsel Unit of the Washington Attorney General’s Office  
37 (“Public Counsel”), and the Northwest Industrial Gas Users (“NWIGU”) have indicated an  
38 interest in participating in or filed a motion to intervene in this proceeding and have  
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1 identified those consultants who will be assisting in the proceeding. The Commission also  
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3 issued a protective order with highly confidential provisions.<sup>1</sup>  
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5 4. PSE has now had a chance to review the parties to the proceeding and their  
6  
7 designated consultants assisting in this proceeding. It does not appear to PSE that such  
8  
9 entities or persons are current or potential suppliers or purchasers of LNG for vehicular fuel  
10  
11 or industrial end uses. PSE has therefore notified each of Staff, Public Counsel, and  
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13 NWIGU that the “highly confidential” provisions would no longer be necessary in this  
14  
15 proceeding and would redesignate those materials previously marked as “highly  
16  
17 confidential” as “confidential”.  
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21 5. Pursuant to WAC 480-07-460(1)(b), PSE requests leave from the  
22  
23 Commission to redesignate the following prefiled direct testimony and supporting exhibits  
24  
25 as “confidential”:  
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- 27 • the Prefiled Direct Testimony of Clay Riding, Exhibit  
28 No. \_\_\_(CR-1CT);
- 29 • the Third Exhibit to the Prefiled Direct Testimony of Clay  
30 Riding, Exhibit No. \_\_\_(CR-4C);
- 31 • the Second Exhibit to the Prefiled Direct Testimony of  
32 Melissa F. Bartos, Exhibit No. \_\_\_(MFB-3C);
- 33 • the Third Exhibit to the Prefiled Direct Testimony of  
34 Melissa F. Bartos, Exhibit No. \_\_\_(MFB-4C);
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43 <sup>1</sup> *In the Matter of Petition of Puget Sound Energy, Inc. for (i) Approval of a Special Contract for*  
44 *Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc., and (ii) a Declaratory Order*  
45 *Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas*  
46 *Services, Order 02 Protective Order with “Highly Confidential” Provisions, Docket UG-151663 (Sept. 9,*  
47 *2015).*

- 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).

1 PSE has made no revisions to these prefiled direct testimonies and supporting exhibits other  
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3 than to redesignate as “confidential” that information previously designated as “highly  
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5 confidential” and to make revisions to other prefiled direct testimonies and supporting  
6  
7 exhibits that referred to these redesignated materials.  
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10 6. For the reasons set forth above, PSE respectfully seeks leave to correct the  
11  
12 following prefiled direct testimonies and supporting exhibits:  
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- 14 • proposed revisions to pages 4, 6, and 45 of the Prefiled  
15 Direct Testimony of Roger Garratt, Exhibit No. \_\_\_\_ (RG-  
16 1CT);  
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- 18 • a proposed revised Prefiled Direct Testimony of Clay  
19 Riding, Exhibit No. \_\_\_\_ (CR-1CT);  
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- 21 • a proposed revised Third Exhibit to the Prefiled Direct  
22 Testimony of Clay Riding, Exhibit No. \_\_\_\_ (CR-4C);  
23
- 24 • proposed revisions to pages 2 and 3 of the Prefiled Direct  
25 Testimony of Melissa F. Bartos, Exhibit No. \_\_\_\_ (MFB-  
26 1T);  
27
- 28 • a proposed revised Second Exhibit to the Prefiled Direct  
29 Testimony of Melissa F. Bartos, Exhibit No. \_\_\_\_ (MFB-  
30 3C);  
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- 32 • a proposed revised Third Exhibit to the Prefiled Direct  
33 Testimony of Melissa F. Bartos, Exhibit No. \_\_\_\_ (MFB-  
34 4C);  
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- 36 • proposed revisions to page 2 of the Prefiled Direct  
37 Testimony of Harold “Skip” York, Exhibit No. \_\_\_\_ (HSY-  
38 1T);  
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- 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:   
\_\_\_\_\_  
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.

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