

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET UE-072300  
DOCKET UG-072301  
(Consolidated)

DOCKET UG-080064

JOINT MOTION OF  
COMMISSION STAFF AND  
PUBLIC COUNSEL TO EXTEND  
TIME TO RESPOND TO PUGET  
SOUND ENERGY, INC. MOTION  
FOR LEAVE TO FILE  
SUPPLEMENTAL TESTIMONY  
AND EXHIBITS

1 Pursuant to WAC 480-07-375(1)(b) and WAC 480-07-385, the Staff of the Washington Utilities and Transportation Commission and the Public Counsel Section of the Attorney General's Office ("Moving Parties") move the Commission to extend the time to respond to the request of Puget Sound Energy, Inc. ("PSE" or "the Company") to file supplemental testimony and exhibits. A response to PSE's motion would normally be due on April 21, 2008.<sup>1</sup> The Moving Parties ask to extend that time one week to April 28, 2008.

**ARGUMENT IN SUPPORT OF MOTION TO EXTEND**

2 WAC 480-07-385(2) states that the Commission will grant an extension of time if the requesting party demonstrates "good cause for the continuance and the continuance will not prejudice any party or the commission."

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<sup>1</sup> WAC 480-07-375(4).

3 Good cause exists to grant the extension of time requested by the Moving Parties.  
On April 14, 2008, PSE filed extensive supplemental testimony, exhibits and work papers.  
In total, these documents include seventeen items of new evidence covering five witnesses  
(John H. Story, Karl R. Karzmar, David E. Mills, David W. Hoff and Janet K. Phelps). The  
sheer volume of materials offered by PSE warrants the extension of time we request.

4 Moreover, at the time of the Company's original filing, PSE stated its intent to  
update its rate year power costs during the course of these proceedings.<sup>2</sup> The supplemental  
testimony, however, not only updates PSE's power cost projections for the rate year, but  
also "corrects certain pro forma and restating adjustments from the original filing, and  
updates various adjustments based on more recent data than the information PSE had  
available to it when it prepared its original filing."<sup>3</sup> An extension of time to respond to  
PSE's motion is required for the Moving Parties to assess whether they oppose supplemental  
testimony and exhibits that encompass more subjects than PSE initially foreshadowed or, in  
the alternative, if PSE's filing necessitates a continuance of the current May 23, 2008,  
deadline for responsive testimony.<sup>4</sup>

5 An extension of time will also not prejudice the Commission, the Company or any  
other party. The Company's motion will still be resolved by the Commission in a timely  
manner and the Company and other parties will still be able to respond to the merits of any  
request to continue the May 23, 2008, deadline for responsive testimony.

6 Finally, the Moving Parties advised all other parties of their motion in advance of  
filing. The Company and Seattle Steam stated that they do not oppose the requested

<sup>2</sup> Advice Nos. 2007-34 and 2007-35, page 1, paragraph 3 (December 3, 2007).

<sup>3</sup> PSE Motion at ¶ 2.

<sup>4</sup> The Company states that its filing is prepared in a manner and presented at a time that will reduce the burden on other parties. Motion at ¶ 5. The Moving Parties' merely seek sufficient time to test the accuracy of that statement.

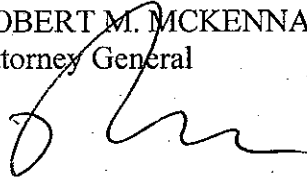
extension of time. The Energy Project stated that it supports the request. All other parties did not respond to our advance notice.

7 For the foregoing reasons, the Commission should grant an extension of time from April 21, 2008, to April 28, 2008, for responses to PSE's motion for leave to file supplemental testimony and exhibits.

DATED this 17<sup>th</sup> day of April, 2008.

Respectfully submitted,

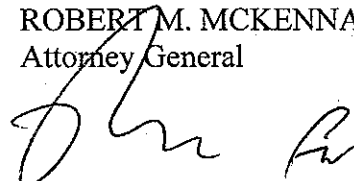
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Public Counsel Section

*per a. Morizakic  
dated 4/16/08*