

**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 AND
EXHIBITS

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 and exhibits submitted with this motion. The purpose of these revisions is to update the original testimony and exhibits of John H. Story, David E. Mills, Donald E. Gaines, David W. Hoff, Louis E. Odom, and R. Clay Riding for information that was not available to PSE at the time it filed its original prefiled direct evidence on May 8, 2009.

2 This supplemental testimony updates PSE's power cost projections for the rate year, updates PSE's load forecast to reflect the significant change in economic data since PSE prepared its prior load forecast during the fall of 2008, revises the cost of long-term debt and rate of return to reflect a recently completed bond issuance, 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. At the time of its original filing, PSE notified the Commission of its intent to file updated testimony and evidence during the course of this proceeding.

3 Accordingly, PSE is filing with this motion the following prefiled supplemental direct testimony and exhibits:

- Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ___(JHS-9T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ___(JHS-10);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ___(JHS-11);
- Third Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ___(JHS-12);
- Fourth Exhibit to the Prefiled Supplemental Direct Testimony of John H. Story, Exhibit No. ___(JHS-13)
- Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-9CT);
- First Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-10);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of David E. Mills, Exhibit No. ___(DEM-11C);
- Prefiled Supplemental Direct Testimony of Donald E. Gaines, Exhibit No. ___(DEG-9T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Donald E. Gaines, Exhibit No. ___(DEG-10C);
- Prefiled Supplemental Direct Testimony of David W. Hoff, Exhibit No. ___(DWH-7T);
- First Exhibit to the Prefiled Supplemental Direct Testimony of David W. Hoff, Exhibit No. ___(DWH-8);

- Prefiled Supplemental Direct Testimony of Louis E. Odom, Exhibit No. ___(LEO-10CT);
- First Exhibit to the Prefiled Supplemental Direct Testimony of Louis E. Odom, Exhibit No. ___(LEO-11C);
- Second Exhibit to the Prefiled Supplemental Direct Testimony of Louis E. Odom, Exhibit No. ___(LEO-12C);
- Prefiled Supplemental Direct Testimony of R. Clay Riding Exhibit No. ___(RCR-4CT);
- First Exhibit to the Prefiled Supplemental Direct Testimony of R. Clay Riding Exhibit No. ___(RCR-5);

4 The Commission's procedural rules require PSE to seek leave for filing its proposed supplemental direct testimony and exhibits because they go 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.

5 PSE's motion should be granted. PSE seeks to add to the record supplemental evidence that will more accurately reflect PSE's projected power costs, load and electric revenue deficiency. PSE has sought to prepare and present its supplemental evidence in a manner that makes it easy for other parties to understand the required changes from PSE's prefiled direct evidence. Allowing PSE to supplement its evidence now will reduce the burden on other parties that would result from having to attempt to update or correct PSE's original filing themselves based on information made available to them in data request responses. Submission of the supplemental testimony at this time also provides

the other parties the opportunity to address the updated information in their response testimonies (due November 17, 2009), which would not be possible if PSE first provided this information in PSE's rebuttal testimony. Finally, PSE has notified the Commission and the parties of its intent to file this update, and PSE believes that the other parties to this proceeding are already generally aware of the substance of the changes made in the supplemental direct testimony, and thus will be neither surprised nor disadvantaged by this filing.

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

DATED: September 28, 2009

Respectfully Submitted,

PERKINS COIE LLP



Sheree Strom Carson, WSBA #25349
Donna L. Barnett, WSBA #36794
Attorneys for Puget Sound Energy, Inc.