

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UG-040640

Docket No. UE-040641

PUGET SOUND ENERGY, INC.'S
MOTION FOR LEAVE TO FILE
REVISED TESTIMONY AND EXHIBITS

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.,

For an Order Regarding the Accounting
Treatment For Certain Costs of the
Company's Power Cost Only Rate Filing

Docket No. UE-031471

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.,

For an Accounting Order Authorizing
Deferral and Recovery of Investment and
Costs Related to the White River
Hydroelectric Project

Docket No. UE-032043

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 revised prefiled rebuttal testimony and exhibits submitted with this motion. The purpose of these

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revisions is to update PSE's prefiled evidence in this proceeding regarding wheeling costs in light of the 2006-2007 Transmission Rate Case Settlement Agreement (the "Transmission Settlement Agreement") issued by the Bonneville Power Administration ("BPA") on December 6, 2004.

2 PSE filed its prefiled rebuttal evidence in this general rate case proceeding on November 3, 2004. BPA's current transmission rates expire September 30, 2005. When PSE filed its direct testimony and exhibits on April 5, 2004, PSE provided an estimate of a 15 percent change in BPA's wheeling rates effective October 1, 2005, based upon a preliminary estimate provided to PSE by BPA. At the time that PSE filed its rebuttal testimony and exhibits on November 3, 2004, BPA had not yet proffered a settlement agreement relating to the BPA 2006 Transmission Rate Case. For purposes of its prefiled rebuttal testimony and exhibits, PSE assumed a 14 percent increase in BPA's wheeling rates effective October 1, 2005. The estimated 14 percent increase in BPA's wheeling rates represented the approximate average increase in transmission rates foreseen by BPA for all classes of customers.

3 On December 6, 2004, BPA issued the Transmission Settlement Agreement. A copy of the Transmission Settlement Agreement is provided with this motion as Exhibit No. ___ (JMR-27). Among other things, the Transmission Settlement Agreement sets a 17.7 percent increase in the IR rate, the rate under which PSE receives the majority of its transmission service. See Transmission Settlement Agreement at page 6, line 11. This 17.7 percent increase in the IR rate is 3.7 percent higher than the 14 percent estimate used by PSE in its rebuttal testimony and exhibits and results in an approximate increase of \$540,000 over the power costs provided in

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PSE's rebuttal filing. In order to flow these changes through to its general rate case, PSE would like to revise the following prefiled rebuttal testimony and exhibits:

- Prefiled Rebuttal Testimony of Julia M. Ryan, Exhibit No. ___(JMR-12CT) at pages 11, 12 and 15;
- Tenth Exhibit to the Prefiled Rebuttal Testimony of Julia M. Ryan, Exhibit No. ___(JMR-22);
- Eleventh Exhibit to the Prefiled Rebuttal Testimony of Julia M. Ryan, Exhibit No. ___(JMR-23);
- Prefiled Rebuttal Testimony of John H. Story, Exhibit No. ___(JHS-7CT) at pages 1, 11, 12, 14 and 28 (please note that not all revisions relate to the Transmission Settlement Agreement, as some are merely corrections under WAC 480-07-460(1)(b)(i) or (iii));
- First Exhibit to the Prefiled Rebuttal Testimony of John H. Story, Exhibit No. ___(JHS-E8) (please note that not all revisions relate to the Transmission Settlement Agreement, as some are merely corrections under WAC 480-07-460(1)(b)(i) or (iii)); and
- Fourth Exhibit to the Prefiled Rebuttal Testimony of John H. Story, Exhibit No. ___(JHS-11) at page 1.

4 The Commission's new procedural rules require PSE to seek leave for filing its proposed revisions because they go beyond revisions to correct mistakes:

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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. The Transmission Settlement Agreement is new information that was not available until two days before the date of this motion. These revisions result in relatively minor revisions to the general rate case filing, and PSE has sought to prepare and present its revised evidence in a manner that makes it easy for other parties to understand the changes that are required.

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

DATED: December 8, 2004

Respectfully Submitted,

PERKINS COIE LLP



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