

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKETS UE-240004 and
)	UG-240005
)	
Complainant,)	
)	PETITION FOR CASE CERTIFICATION
v.)	AND NOTICE OF INTENT TO
)	REQUEST FUND GRANT OF
PUGET SOUND ENERGY,)	THE ALLIANCE OF WESTERN
)	ENERGY CONSUMERS
)	
Respondent.)	

1 Pursuant to WAC § 480-07-370(3), Order 02 issued by the Washington Utilities and Transportation Commission (“Commission”) in Docket No. U-210595, and Articles 5.2.1 and 6.2 of the Washington Extended Interim Participatory Funding Agreement (“Extended Interim Agreement”), the Alliance of Western Energy Consumers (“AWEC”) files this Petition for Case Certification (“Petition”) and Notice of Intent to Request Fund Grant (“Notice”) in the above-referenced dockets.

2 As required by Article 6.2 of the Extended Interim Agreement, AWEC is filing this Petition and Notice prior to the time designated by the Commission. AWEC is also serving this Petition and Notice on Puget Sound Energy (“PSE”) and each party to the proceeding.

3 Pursuant to Article 6.2, AWEC identifies the PSE Customer Representation Sub-Fund as the fund from which AWEC requests a Fund Grant. AWEC will file its Proposed Budget for this proceeding within 30 days of the conclusion of the prehearing conference or by such other date as the Commission designates.

4 The Extended Interim Agreement provides funds “to qualified parties to enable them to advocate on behalf of broad customer interests in proceedings before the [Commission].”¹ To be eligible for funding under the Extended Interim Agreement, a Participating Organization must be (1) case-certified for (2) an Eligible Proceeding. An “Eligible Proceeding” is, among other things, “any proceeding before the Commission carried out in accordance with or under the auspices of the public service laws, Commission regulations, or Commission orders ... directly affecting one or more of the Participating Public Utilities, in which matters materially affecting the public interest are at issue.”²

5 PSE’s 2024 General Rate Case qualifies as an “Eligible Proceeding.” PSE is a Participating Public Utility under the Extended Interim Agreement.³ Additionally, this case will be carried out under the public service laws, namely RCW § 80.28.020, among others, and it will materially affect the public interest.

6 Under Article 5.1 of the Extended Interim Agreement, “[o]nly parties that are case-certified for a particular proceeding will be eligible to receive Fund Grants.” Article 5.2.1 provides the necessary criteria for being case-certified to receive Fund Grants from the Customer Representation Sub-Fund. AWEC meets each of these criteria.

7 First, AWEC is neither a for-profit organization nor a governmental entity. AWEC is a non-profit organization formed for the benefit of its members.

8 Second, AWEC represents broad customer interests. AWEC represents the class of industrial customers that take electric service from PSE and has several members that are PSE

¹ Extended Interim Agreement, Recitals.

² Extended Interim Agreement, Article 1(c).

³ *Id.* Article 1(g).

industrial customers. While the Commission declined to specifically define what constitutes “broad customer interests” in its Policy Statement on Participatory Funding for Regulatory Proceedings,⁴ RCW § 80.28.430(1), the statute authorizing the Extended Interim Agreement, explicitly states that “broad customer interests” includes industrial customers. Moreover, the Commission has previously found that AWEC represents broad customer interests in PSE proceedings.⁵

9 Third, AWEC has demonstrated in past proceedings that it is able to effectively represent PSE’s industrial customers. AWEC has been granted intervention, and has fully participated, in many prior PSE rate proceedings, including its most recent General Rate Case, UE-220006/UG-220007, and its Tacoma LNG Tracker Tariff Filing, UG-230393. AWEC routinely sponsors multiple expert witnesses that identify numerous adjustments to PSE’s proposed revenue requirement. AWEC’s advocacy has directly resulted in lower energy costs both for industrial customers and for PSE’s customers overall.

10 Fourth, no other party to this proceeding (and, thus, no other stakeholder that could be case-certified) adequately represents the interests of industrial customers. Moreover, as demonstrated above, the specific interests of industrial customers and the public interest will benefit from AWEC’s participation in this proceeding.

11 Finally, AWEC’s request for case-certification will not unduly delay this proceeding.

⁴ Docket No. U-210595, Policy Statement ¶ 27 (Nov. 19, 2021).

⁵ Docket Nos. UE-220006/UG-220007, Order 08 ¶ 24 Mar. 24, 2022).

Accordingly, AWEC respectfully requests that its Petition for Case Certification be granted as provided in the Extended Interim Agreement.

Dated this 26th day of February, 2024

Respectfully submitted,

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