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BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230393

PUYALLUP TRIBE OF INDIANS'
PETITION TO INTERVENE

1. Pursuant to WAC 480-07-355(1) the Puyallup Tribe of Indians (“Tribe”) hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for leave to intervene in the above captioned docket as an intervenor. The Tribe requests intervention with full party status as described in WAC 480-07-340.

2. The address of the Tribe is:

Puyallup Tribe of Indians
3009 East Portland Avenue
Tacoma, WA 98404

3. The Tribe will be represented in this proceeding by Lisa A. Anderson of the Law Office of the Puyallup Tribe, and Nicholas G. Thomas and Andrew S. Fuller of Ogden Murphy

1 Wallace, PLLC. All documents to this proceeding shall be served on Ms. Anderson, Mr.
2 Thomas, and Mr. Fuller in electronic format at the email addresses below:

3 Lisa Anderson
4 Law Office, Puyallup Tribe of Indians
5 3009 East Portland Avenue
6 Tacoma, WA 98404
7 Lisa.Anderson@PuyallupTribe-nsn.gov

8 Nicholas Thomas
9 Andrew Fuller
10 Ogden Murphy Wallace, PLLC
11 901 5th Avenue, Suite 3500
12 Seattle, WA 98164
13 NThomas@omwlaw.com
14 AFuller@omwlaw.com

15 4. The Puyallup Tribe is a federally recognized Indian Tribe with its reservation located in
16 Pierce and King Counties, and its governmental headquarters is located in Tacoma,
17 Washington. The Tribe, as a governmental entity, owns and operates land and facilities on
18 those lands that utilize Puget Sound Energy for utility services and pays PSE for those services.
19 *See* Declaration of Tribal Financial Officer Matthew Wadhvani at Appendix A.¹ Furthermore,
20 the Tribe has members who are PSE customers and who may, from time to time, be eligible for
21 need-based utility assistance from the Tribe. The Tribe is in a unique position to represent the
22 interests of those specific ratepayers.

23 5. In addition to being a ratepayer with a definitive interest in the rates charged by PSE –
and an interest in the accuracy of representations regarding whether PSE’s decisions regarding
development of the Tacoma LNG Plant and the four-mile distribution line serving the Tacoma
LNG Plant made after September 16, 2016 were prudent and in the public interest, the Tribe
holds unique and distinct evidence to present as to the nature of the costs incurred for the
construction and permitting of the plant and distribution line that will benefit the Commission
in its analysis of the prudence of PSE’s post-September 16, 2016 decisions and the associated

¹ Appendix A is the Tribe’s February 2022 Petition to Intervene in related WUTC dockets UE-220066 and UG-220067. Mr. Wadhvani’s declaration is found at page 5 of Appendix A.

1 cost allocation. Some of this evidence was presented to the Commission in dockets UE-220066
2 and UG-220067 but the Tribe understands that the UTC may not refer to that record in this
3 proceeding. The Tribe intends to submit relevant information and evidence to assist the
4 Commission in its analysis and decision-making. Furthermore, the Tribe sits in the unique
5 position to present evidence as to the contribution this plant will have to natural gas service
6 provided to ratepayers which is contrary to prior representations made by PSE. The Tribe
7 remains concerned that the actual benefit to ratepayers is being overestimated and wishes to
8 make certain the Commission is provided with all information relevant to that issue. The
9 Tribe's evidence will show that the Tacoma LNG Plant and its associated facilities negatively
10 impact the Tribe and nearby environmental justice communities while providing only a fraction
of the natural gas the company originally projected to benefit ratepayers.

11 6. The Tribe has a direct and substantial interest in PSE's filing in this docket and no other
12 party will adequately represent those interests. The Tribe is in a unique position to provide
13 clear evidence as to PSE's post-September 16, 2016 decisions, the actual use of the Tacoma
14 LNG facility for ratepayer interests, and the impacts of PSE's decisions on tribal members and
15 the surrounding community. The Tribe's participation will be narrow and focused; its
16 intervention will not unreasonably broaden the issues, burden the record, or delay the
17 proceeding. Accordingly, it is in the public interest to allow the Tribe to intervene in this docket.
18 Indeed, this proceeding is associated with dockets UE-220066 and UG-220067, in which the
Commission previously found the Tribe's intervention to be in the public interest.

19 7. For the foregoing reasons, the Tribe respectfully petitions the Commission for leave to
20 intervene in this proceeding.

21 //

22 //

1 Signed this 21st day of June, 2023.

2 PUYALLUP TRIBE OF INDIANS

3
4 s/ Lisa A. Anderson

5 Lisa A. Anderson, WSBA #27877
6 Law Office, Puyallup Tribe of Indians
7 3009 East Portland Ave.
8 Tacoma, WA 98404
9 Phone: 253-573-7852; Fax: 253-680-5998
10 Email: Lisa.Anderson@puyalluptribe-nsn.gov

11 Nicholas G. Thomas, WSBA #42154
12 Andrew S. Fuller, WSBA # 51849
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14 901 Fifth Avenue, Suite 3500
15 Seattle, Washington 98164-2008
16 Tel: 206.447.7000/Fax: 206.447.0215
17 Email: nthomas@omwlaw.com
18 afuller@omwlaw.com

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Attorneys for Intervenor Puyallup Tribe of Indians

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APPENDIX A

Puyallup Tribe of Indians’ Petition to Intervene in consolidated WUTC Dockets UE-220066 and UG-220067 and attached Declaration of Matthew Wadhvani

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BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067

PUYALLUP TRIBE OF INDIANS'
PETITION TO INTERVENE

1. Pursuant to WAC 480-07-355(1), the Puyallup Tribe of Indians (“Tribe”) hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for leave to intervene in the above-captioned consolidated dockets as an intervenor. The Tribe requests intervention with full party status as described in WAC 480-07-340.

2. The address of the Tribe is:

Puyallup Tribe of Indians
3009 East Portland Avenue
Tacoma, WA 98404.

3. The Tribe will be represented in this proceeding by Lisa A. Anderson, Samuel J. Stiltner, and Alec S. Wrolson of the Law Office of the Puyallup Tribe; and by Nicholas G.

1 Thomas of Ogden Murphy Wallace, PLLC. All documents to this proceeding shall be served
2 on Ms. Anderson, Mr. Stiltner, Mr. Wrolson, and Mr. Thomas in electronic format at the
3 email addresses below:

4 Lisa Anderson
5 Sam Stiltner
6 Alec Wrolson
7 Law Office
8 Puyallup Tribe of Indians
9 3009 East Portland Avenue
10 Tacoma, WA 98404
11 (253)573-7852
12 lisa.anderson@puyalluptribe-nsn.gov
13 sam.stiltner@puyalluptribe-nsn.gov
14 alec.wrolson@puyalluptribe-nsn.gov

15 Nicholas Thomas
16 Ogden Murphy Wallace, PLLC
17 901 5th Avenue, Suite 3500
18 Seattle, WA 98164
19 nthomas@omwlaw.com

20 4. The Tribe is a federally recognized Indian Tribe with its reservation located in Pierce
21 and King Counties, and its governmental headquarters is located in Tacoma, Washington.
22 The Tribe, as a governmental entity, owns and operates land and facilities on those lands that
23 utilize Puget Sound Energy (“PSE”) for utility services and pays PSE for those services. *See*
Declaration of Matthew Wadhvani (“Wadhvani Decl.”) attached as Exhibit A. Furthermore,
the Tribe has members who are PSE customers and who may, from time to time, be eligible
for need-based utility assistance from the Tribe. The Tribe is in a unique position to represent
the interests of those specific ratepayers.

5. In addition to being a ratepayer with a definitive interest in the rates charged by PSE –
and an interest in the accuracy of representations regarding whether development of the
Tacoma LNG Plant is prudent to support utility rates reflecting and capturing the costs for the

1 development of the plant – the Tribe holds unique and distinct evidence to present on the
2 following issues: the purported reasonableness and prudence of the costs PSE incurred in
3 constructing and permitting the Tacoma LNG plant. The Tribe intends to submit this
4 information and evidence to assist the Commission in its analysis and decision-making. The
5 Tribe is uniquely situated to efficiently provide this information for consideration in this
6 proceeding. The Tribe is also uniquely able to present evidence regarding the *actual* natural
7 gas service provided to ratepayers by the Tacoma LNG plant; this evidence consists of
8 representations that PSE has made to regulatory agencies in the permitting process and
9 controverts PSE’s representations in this case. Specifically, the Tribe can present evidence
10 that, according to PSE’s representations to permitting agencies, Tacoma LNG will provide
11 ratepayers a small fraction of the natural gas that PSE originally projected to benefit
12 ratepayers. The Tribe has concerns that the actual benefit to ratepayers is not being accurately
13 presented to the Commission and wishes to make certain the Commission is provided with all
14 information relevant to that issue.

15 6. The Tribe has a direct and substantial interest in PSE’s filing in this docket and no
16 other party will adequately represent those interests. The Puyallup Tribe will be in a unique
17 position to provide clear evidence as to the actual use of the facility for ratepayer interests.
18 The Puyallup Tribe’s participation will be narrow and focused; its intervention will not
19 unreasonably broaden the issues, burden the record, or delay the proceeding. Accordingly, it
20 is in the public interest to allow the Puyallup Tribe to intervene in this docket.

21 7. For the foregoing reasons, the Tribe respectfully petitions the Commission for leave to
22 intervene in this proceeding.
23

1
2 Signed this 23rd day of February, 2022.

3
4 PUYALLUP TRIBE OF INDIANS

5 s/ Lisa A. Anderson, WSBA #27877

6 s/ Samuel J. Stiltner, WSBA #7765

7 s/ Alec Wrolson, WSBA #54076

8 Law Office, Puyallup Tribe of Indians

9 3009 East Portland Ave.

10 Tacoma, WA 98404

11 Phone: 253-573-7852; Fax: 253-680-5998

12 Email: lisa.anderson@puyalluptribe-nsn.gov

13 sam.stiltner@puyalluptribe-nsn.gov

14 alec.wrolson@puyalluptribe-nsn.gov

15 s/ Nicholas G. Thomas, WSBA #42154

16 Ogden Murphy Wallace, P.L.L.C.

17 901 5th Avenue, Suite 3500

18 Seattle, WA 98164

19 Phone: 206-447-7000; Fax: 206-447-0215

20 Email: nthomas@omwlaw.com

21 **Attorneys for Appellant Puyallup Tribe of Indians**

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BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067

DECLARATION OF MATTHEW
WADHWANI

1. I, Matthew Wadhvani, under penalty of perjury, declares as set forth below:
2. I am over the age of 18 years, and competent to be a witness herein and I have personal knowledge regarding the matters set out in this declaration.
3. I am the Tribal Financial Officer (TFO) for the Puyallup Tribe of Indians. I have worked as the TFO for 1.25 years.
4. Attached as Exhibit 1 is a true and correct copy of list of payments the Puyallup Tribe paid to PSE for utility services at Tribal owned facilities for the current fiscal year through February 15, 2022.

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5. I certify under penalty of perjury under the laws of Washington that the foregoing is true and correct to the very best of my knowledge and belief. Signed at Tacoma, Washington within the Puyallup Reservation this 23rd day of March, 2022.



Matthew Wadhvani, CPA - inactive
Tribal Financial Officer
Puyallup Tribe of Indians

EXHIBIT 1

Vendor Name	Document Number	Document Date	Document Amount	Natural Gas	Electric
PUGET SOUND ENERGY	INV-3420-220201	2/1/2022	66.55	\$41.55	
PUGET SOUND ENERGY	INV-4921-220201	2/1/2022	176.69	\$176.96	
PUGET SOUND ENERGY	INV-4947-220201	2/1/2022	170.38	\$170.38	
PUGET SOUND ENERGY	INV-4954-220201	2/1/2022	352.70	\$352.70	
PUGET SOUND ENERGY	INV-8271-220201	2/1/2022	269.68	\$269.68	
PUGET SOUND ENERGY	INV-8462-220201	2/1/2022	210.44	\$210.44	
PUGET SOUND ENERGY	INV-9007-220201	2/1/2022	1,019.12	\$1,019.12	
PUGET SOUND ENERGY	INV-4939-220131	1/31/2022	149.01	\$149.01	
PUGET SOUND ENERGY	INV-0561-220121	1/21/2022	401.61		\$401.61
PUGET SOUND ENERGY	INV-0875-220121	1/21/2022	5,415.51		\$5,415.51
PUGET SOUND ENERGY	INV-6896-220119	1/19/2022	36.73	\$36.73	
PUGET SOUND ENERGY	INV-0875-211221	1/12/2022	2,953.14		\$2,953.14
PUGET SOUND ENERGY	INV-5011-220112	1/12/2022	2,000.71		\$1,972.48
PUGET SOUND ENERGY	INV-1625-220105	1/5/2022	1,008.72	\$1,008.72	
PUGET SOUND ENERGY	INV-1914-220103	1/3/2022	124.93	\$124.93	
PUGET SOUND ENERGY	INV-4921-220103	1/3/2022	179.73	\$179.73	
PUGET SOUND ENERGY	INV-4947-220103	1/3/2022	136.66	\$136.66	
PUGET SOUND ENERGY	INV-4954-220103	1/3/2022	356.17	\$356.17	
PUGET SOUND ENERGY	INV-5789-220103	1/3/2022	117.52	\$117.52	
PUGET SOUND ENERGY	INV-8271-220103	1/3/2022	255.49	\$255.49	
PUGET SOUND ENERGY	INV-8462-220103	1/3/2022	218.17	\$218.17	
PUGET SOUND ENERGY	INV-8645-220103	1/3/2022	1,949.57		\$1,949.57
PUGET SOUND ENERGY	INV-9007-220103	1/3/2022	912.06	\$912.06	
PUGET SOUND ENERGY	INV-9817-220103	1/3/2022	35.32	\$35.32	
PUGET SOUND ENERGY	INV-4939-211230	12/30/2021	154.90	\$154.90	
PUGET SOUND ENERGY	INV-7619-211228	12/28/2021	43.39		\$43.39
PUGET SOUND ENERGY	INV-7874-211228	12/28/2021	467.42		\$467.42
PUGET SOUND ENERGY	INV-0561-211221	12/21/2021	313.17		\$313.17
PUGET SOUND ENERGY	INV-6896-211219	12/19/2021	36.73	\$36.73	
PUGET SOUND ENERGY	INV-1625-211207	12/7/2021	759.10	\$759.10	
PUGET SOUND ENERGY	INV-8719-211206	12/6/2021	296.48	\$296.48	
PUGET SOUND ENERGY	INV-1914-211202	12/2/2021	235.29	\$235.29	

PUGET SOUND ENERGY	INV-3420-211202	12/2/2021	12.50	\$12.50	
PUGET SOUND ENERGY	INV-4921-211202	12/2/2021	127.65	\$127.65	
PUGET SOUND ENERGY	INV-4947-211202	12/2/2021	117.75	\$117.75	
PUGET SOUND ENERGY	INV-4954-211202	12/2/2021	265.08	\$265.08	
PUGET SOUND ENERGY	INV-5789-211202	12/2/2021	93.81	\$93.81	
PUGET SOUND ENERGY	INV-8271-211202	12/2/2021	273.57	\$273.57	
PUGET SOUND ENERGY	INV-8462-211202	12/2/2021	194.13	\$194.13	
PUGET SOUND ENERGY	INV-9007-211202	12/2/2021	932.26	\$932.26	
PUGET SOUND ENERGY	INV-9817-211202	12/2/2021	35.32	\$35.32	
PUGET SOUND ENERGY	INV-4939-211201	12/1/2021	103.80	\$103.80	
PUGET SOUND ENERGY	INV-0561-211119	11/19/2021	236.82		\$236.82
PUGET SOUND ENERGY	INV-0875-211119	11/19/2021	2,956.44		\$2,956.44
PUGET SOUND ENERGY	INV-9609-211119	11/19/2021	192.21	\$192.21	
PUGET SOUND ENERGY	INV-6896-211117	11/17/2021	36.73	\$36.73	
PUGET SOUND ENERGY	INV-1625-211104	11/4/2021	467.92	\$467.92	
PUGET SOUND ENERGY	INV-8719-211103	11/3/2021	106.94	\$106.94	
PUGET SOUND ENERGY	INV-1914-211101	11/1/2021	0.36	\$0.36	
PUGET SOUND ENERGY	INV-4921-211101	11/1/2021	72.43	\$72.43	
PUGET SOUND ENERGY	INV-4947-211101	11/1/2021	72.43	\$72.43	
PUGET SOUND ENERGY	INV-4954-211101	11/1/2021	157.34	\$157.34	
PUGET SOUND ENERGY	INV-5789-211101	11/1/2021	62.65	\$62.65	
PUGET SOUND ENERGY	INV-8271-211101	11/1/2021	230.58	\$230.58	
PUGET SOUND ENERGY	INV-8462-211101	11/1/2021	156.68	\$156.68	
PUGET SOUND ENERGY	INV-8645-211101	11/1/2021	1,373.36		\$1,373.36
PUGET SOUND ENERGY	INV-9007-211101	11/1/2021	686.59	\$686.59	
PUGET SOUND ENERGY	INV-9817-211101	11/1/2021	35.32	\$35.32	
PUGET SOUND ENERGY	INV-4939-211029	10/29/2021	72.01	\$72.01	
PUGET SOUND ENERGY	INV-0561-211021	10/21/2021	233.13		\$233.13
PUGET SOUND ENERGY	INV-0875-211021	10/21/2021	2,565.02		\$2,565.02
PUGET SOUND ENERGY	INV-9609-211021	10/21/2021	64.37	\$64.37	
PUGET SOUND ENERGY	INV-6896-211019	10/19/2021	36.73	\$36.73	
PUGET SOUND ENERGY	INV-8719-211011	10/11/2021	44.47	\$44.47	
PUGET SOUND ENERGY	INV-1625-211004	10/4/2021	59.58	\$59.58	