

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY

Clean Energy Implementation Plan
Pursuant to WAC 480-100-640

DOCKET UE-210795

**FRONT AND CENTERED'S
REQUEST FOR PAYMENT OF
FUND GRANT**

1 Pursuant to Order 05 in Docket No. UE-210795 Granting Requests For Case Certification issued
by the Washington Utilities and Transportation Commission (“UTC”) and Order 06 Approving
Proposed Budgets and Fund Grants in Part; Rejecting in Park, in the same docket, Front and
Centered (“FAC”) hereby respectfully requests payment of a Fund Grant from the Customer
Access Fund for Puget Sound Energy (“PSE”)¹ in the amount of \$45,000 for staff time and
expert consultant fees. In support of this request, FAC states the following:

2 On December 17, 2021, PSE filed with the UTC its final Clean Energy Implementation Plan
 (“CEIP”) in Docket UE-210795. On April 19, 2022, the UTC issued a Notice of Prehearing
 Conference in this docket, and FAC timely intervened.

3 On June 3, 2022, FAC filed a Request for Case Certification and Notice of Intent to Request a
 Fund Grant (Notice and Request). On June 16, 2022, the Commission approved FAC’s request.²

4 On June 22, 2022, FAC filed a Proposed Budget and requested a Fund Grant in this docket in the
 amount of \$60,000 to partially offset the costs of its participation in the proceeding. The
 Commission approved FAC’s Proposed Budget for a Fund Grant in the amount of \$55,000,
 allocating \$40,000 for expert consultants and witnesses and \$15,000 for staff time, on July 15,
 2022.³

¹ See *Petition for approval of an interim participatory funding agreement pursuant to RCW 80.28.430*,
 Docket U-210595 Order 01 (February 24, 2022), Attachment A § 4.2 (Executed February 24, 2022)
 (hereinafter “Funding Agreement”).

² Order 05, Granting Requests for Case Certification (June 16, 2022).

³ Order 06, Approving Proposed Budgets (July 15, 2022).

5 FAC focused on matters related to various aspects of Puget Sound Energy’s CEIP, including but not limited to Puget Sound Energy’s compliance with Washington state clean energy and equity law and policy – especially the Washington Clean Energy Transformation Act (Chapter 19.405 RCW). FAC (jointly with the NW Energy Coalition) sponsored expert testimony addressing topics including vulnerable population designations; customer benefit indicators; PSE’s interim clean energy targets including demand response; specific actions including community solar; minimum designations for named communities; public participation; PSE’s incremental cost calculation; and the use of the social cost of greenhouse gas emissions in PSE’s portfolio modeling.

6 FAC respectfully submits that this request for payment satisfies the requirement of the Funding Agreement Section 7.1 as follows:

- a. Section 7.1(a). The itemized expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert fees and travel expenses are attached as Confidential Exhibit A.
- b. Section 7.1(b). FAC was a full and active participant in this docket and the expenses are reasonable and directly attributable to issues and positions pursued on behalf customers including expert witness testimonies addressing the impacts of PSE’s proposed investments on customers, and the environment. FAC issued and reviewed discovery, participated in settlement conferences, participated in several prehearing/status conferences, filed numerous expert witness testimonies, reviewed testimony of other parties; prepared for and attended an evidentiary hearing; and filed a closing brief. The expenses included in Confidential Attachment A are Eligible Expenses as defined in Funding Agreement Section 7.3 and are reasonable and directly attributable to FAC’s participation in UE-210795.
- c. Section 7.1(d). This request is a final request for payment under this Approved Fund Grant for the full amount of the Approved Fund Grant.

d. Section 7.3. All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.3 of the Funding Agreement.

7 Upon approval of this request for payment by the Commission, please send payment to FAC as follows:

Front and Centered
1501 East Madison Street, Suite 250
Seattle, WA 98122

8 FAC has satisfied the terms of the Funding Agreement and respectfully requests that the Commission approve payment of FAC's Fund Grant in the amount of \$45,000 from the PSE Customer Representation Sub-Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the Funding Agreement.

Dated this 3rd day of August, 2023.

/s/ Amanda Goodin

Amanda Goodin
Molly Tack-Hooper
Earthjustice
810 Third Avenue, Suite 610
Seattle, WA 98104
Ph: (206) 701-7613
agoodin@earthjustice.org
mtackhooper@earthjustice.org
Attorneys for NW Energy Coalition