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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
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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	