

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKETS UE-220066 and UG-220067 (<i>Consolidated</i>)
)	
Complainant,)	PETITION FOR CASE
)	CERTIFICATION AND NOTICE OF
v.)	INTENT TO REQUEST FUND GRANT
)	OF THE ALLIANCE OF WESTERN
PUGET SOUND ENERGY)	ENERGY CONSUMERS
)	
Respondent.)	
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1 Pursuant to WAC § 480-07-370(3), Order 01 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 Interim Participatory Funding Agreement (“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 Interim Agreement, AWEC is filing this Petition and Notice at 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. In accordance with Commission Order 03 in the above-captioned proceeding, AWEC will file a Proposed Budget no later than April 13, 2022.

4 The 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 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 2022 General Rate Case qualifies as an “Eligible Proceeding.” PSE is a Participating Public Utility under the 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. PSE has proposed a three-year rate plan with first-year rate impacts of 13.59% for electric service and 12.98% for gas service.^{4/} The Commission has already found that these proposed rate increases “might injuriously affect the rights and interest of the public” and has suspended PSE’s proposed tariffs for further investigation.^{5/}

6 Under Article 5.1 of the 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 criteria necessary for being case-certified to receive Fund Grants from the Customer Representation Sub-Fund. AWEC meets each of these criteria.

^{1/} Interim Agreement, Recitals.

^{2/} Interim Agreement, Article 1(c).

^{3/} Id. Article 1(g).

^{4/} Order 01 ¶ 2 & 4 (Feb. 10, 2022).

^{5/} Id. ¶ 5.

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 and natural gas service from PSE, and has several
members that are PSE industrial customers. While the Commission declined to specifically
define what constitutes “broad customer interests” in its Policy Statement on Participatory
Funding for Regulatory Proceedings,^{6/} RCW § 80.28.430(1), the statute authorizing the Interim
Agreement, explicitly states that “broad customer interests” includes industrial customers.

9 Third, AWEC has demonstrated in numerous past proceedings that it is able to
effectively represent PSE’s industrial customers. AWEC has been granted intervention, and has
fully participated, in all of PSE’s previous rate cases for at least the past 20 years. 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. The
Commission affirmatively determined this when it granted AWEC’s petition to intervene in this
proceeding. Moreover, as demonstrated above, the specific interests of industrial customers and
the public interest will benefit from AWEC’s participation in this proceeding.

^{6/} Docket No. U-210595, Policy Statement ¶ 27 (Nov. 19, 2021).

11 Finally, AWEC's request for case-certification will not unduly delay this proceeding. The Commission has already approved a schedule for this proceeding, and AWEC's Petition will not have any impact on any of the dates in the approved schedule.

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

Dated this 14th day of March, 2022.

Respectfully submitted,

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