

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and
UG-220067 (*Consolidated*)

**FRONT AND CENTERED
PETITION TO INTERVENE**

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, Front and Centered petitions the Washington Utilities and Transportation Commission (the “Commission”) to intervene in the above-captioned proceeding with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, Front and Centered states as follows:

2. The name and address of Front and Centered is:

Mariel Thuraisingham
Front and Centered
1501 East Madison Street
Suite 250
Seattle, WA 98122
mariel@frontandcentered.org

3. Front and Centered will be acting as a pro se litigant in this proceeding.

4. Front and Centered is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. Front and Centered is a climate justice coalition of organizations led by and serving communities of color in Washington. Our mission is to advocate for the interests of frontline communities who are first and worst impacted by the climate crisis, particularly low income and BIPOC communities, in advancing a just and equitable transition from an extractive to a regenerative economy. A large number of our coalition members provide direct services and

community support to Puget Sound Energy (“PSE”) customers who constitute highly-impacted communities and vulnerable populations.

5. Front and Centered is actively following the implementation of the Clean Energy Transformation Act (“CETA”), including participation in Puget Sound Energy’s Clean Energy Implementation Plan (“CEIP”) process. Front and Centered has also been involved in PSE’s Equity Advisory Group and participated in discussions on the company’s proposed Bill Discount program. A number of stakeholders, including Front and Centered, have advocated extensively for the adoption and enforcement of strong customer programming and protection measures to reinforce CETA’s energy assistance mandate and to secure equitable access to essential energy services with dignity in times of public health and economic crisis. Due to Front and Centered’s interest in the process and outcomes of PSE’s rate case with respect to clean transition and equitable access goals, Front and Centered is well positioned to provide informed and useful perspectives on key issues being raised.

6. Front and Centered will seek to elevate the voices of historically underrepresented and highly-impacted communities in this process.

7. Front and Centered has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through their intervention. It is early enough in the proceeding that joining as a party at this time will not unduly burden or complicate the parties.

8. Front and Centered is filing this petition late with good cause. It has only lately come to the attention of Front and Centered that it was in the interest and capacity of the coalition to engage in the rate case. The decision came out of agreement from our member-led leadership structure on the alignment of existing priorities with select issues in the proceeding.

Front and Centered is particularly concerned with the equitable application of clean transition benefits, implementation of low income programming and impacts of performance and rate design mechanisms for highly-impacted communities and vulnerable populations in the case. The availability of Participatory Funding will make it all the more feasible for prioritized organizations, like Front and Centered, to elevate the interests of underrepresented stakeholders in support of this rate case and other Commission proceedings.

9. It is in the public interest to allow Front and Centered to intervene in this proceeding.

10. For the foregoing reasons, Front and Centered respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 14th day of March, 2022.

Respectfully submitted,

/s/ Mariel Thuraisingham

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Clean Energy Policy Lead
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