

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-240004 and UG-230005  
(Consolidated)

**FRONT AND CENTERED,  
NORTHWEST ENERGY COALITION,  
AND SIERRA CLUB'S PETITION TO  
INTERVENE**

1. Pursuant to WAC 480-07-355, NW Energy Coalition, Front and Centered, and Sierra Club (collectively "Joint Environmental Advocates"), hereby petition the Washington Utilities and Transportation Commission ("UTC" or "Commission") for leave to intervene in the above-referenced docket as intervenors with full party status, as described in WAC 480-07-340.

Business addresses and contact information for purposes of service are as follows:

Lauren McCloy  
NW Energy Coalition  
811 1st Ave, Suite 305  
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Front and Centered  
2800 1st Avenue, Suite 201  
Seattle, WA 98121  
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Jim Dennison  
Sierra Club  
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FRONT AND CENTERED, NORTHWEST ENERGY  
COALITION, AND SIERRA CLUB'S  
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*Earthjustice*  
810 Third Ave. Suite 610  
Seattle, WA 98104  
(206) 343-7340

2. The Joint Environmental Advocates will be represented in this proceeding by Earthjustice. Sierra Club will be additionally represented by in-house counsel. All documents relating to this proceeding should additionally be served electronically on Joint Environmental Advocates' attorneys at the following addresses:

Jan Hasselman  
*Attorney for JEAs*  
Earthjustice  
810 3rd Ave, Suite 610  
Seattle, WA  
jhasselman@earthjustice.org  
(206) 629-8752

Jim Dennison  
*Attorney for Sierra Club*  
Sierra Club  
1650 38th St.  
Suite 103W  
Boulder, CO 80301  
jim.dennison@sierraclub.org  
(435) 232-5784

Counsel will separately file a notice of appearance with the Commission, as required by WAC 480-07-345(2).

3. Joint Environmental Advocates do not request paper service, unless required by UTC rules or law. If permitted by the presiding officer, Joint Environmental Advocates also request that electronic service be provided to the following:

Diana Brechtel  
Paralegal  
Earthjustice  
810 3rd Ave, Suite 610  
Seattle, WA 98104  
dbrechtel@earthjustice.org  
(206) 531-0759

4. NWEC is a nonprofit alliance of over 100 environmental, civic, and human services organizations, utilities, and businesses in the Northwest advancing clean, equitable, and affordable energy policies by providing technical and policy leadership on energy issues in the region.

5. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of itself and its more than 25,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of Puget Sound Energy (“PSE”).

6. Front and Centered is a non-profit organization incorporated in the state of Washington. Front and Centered is a climate justice coalition of organizations led by and serving communities of color in Washington. Its 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 Front and Centered’s coalition members provide direct services and community support to Puget Sound Energy customers who constitute highly-impacted communities and vulnerable populations.

7. Collectively, the Joint Environmental Advocates have a substantial interest in PSE’s proposed revisions to rates. They have been granted intervention without opposition and participated closely in other rate cases for PSE and other utilities under the UTC’s jurisdiction.

8. The Joint Environmental Advocates seek to intervene in this proceeding to advance an equitable transition away from reliance on fossil fuels and toward a clean energy system, consistent with state policy. PSE’s application affects these interests by proposing changes to rates and policies that relate to its role in equitably and affordably meeting Washington’s energy and decarbonization policies.

9. PSE's application in this proceeding indicates that the transition away from fossil fuels in the gas system is now underway and that gas utilization is already declining. This is an important and positive development if the state is to meet its ambitious goals of protecting public health and drastically reducing greenhouse gas emissions. But this transition requires bold action in this decisive moment, and it must be managed carefully to ensure that PSE deploys the most effective strategies and established resources to meet its decarbonization obligations. It also requires PSE, stakeholders, and the Commission to ensure that both the benefits and costs of the transition are shared equitably, and that the most vulnerable members of society are protected. The Joint Environmental Advocates will participate to ensure that momentum towards a sustainable and equitable gas transition continues to accelerate, and will elevate the voices of historically underrepresented and highly impacted communities.

10. The Joint Environmental Advocates' expertise in resource planning, industry structure, economic and policy analysis, as well as environmental and community representation and advocacy, will assist the Commission in resolving issues. Their participation will not broaden the issues, burden the record, or delay this proceeding.

11. The Joint Environmental Advocates' interests in the proceeding will not be adequately represented by any other party and may be affected by any Commission determination made in connection with this proceeding. Accordingly, it is in the public interest to allow intervention.

12. For the foregoing reasons, Joint Environmental Advocates respectfully petition the Commission for leave to intervene in this proceeding.

Dated this 27<sup>th</sup> day of March, 2024.

Respectfully submitted,

/s/ Jan Hasselman

Jan Hasselman (WA Bar No. 29107)

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*Attorney for Joint Environmental Advocates*