

**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 AND
NORTHWEST ENERGY COALITION'S
REQUEST FOR CASE
CERTIFICATION AND NOTICE OF
INTENT TO REQUEST A FUND GRANT**

Pursuant to RCW 80.28.430 and the Washington Extended Interim Participatory Funding Agreement (Funding Agreement), Front and Centered and the Northwest Energy Coalition hereby submit this Request for Case Certification and Notice of Intent to Request a Fund Grant. This notice is timely filed, and this proceeding is eligible under Article 1(g) of the Funding Agreement.

Pursuant to Article 5 of the Funding Agreement, NWECC requests certification as a “customer representative organization,” and Front and Centered requests certification as a “prioritized organizations” group. The specific budget allocation between these sub-funds will be proposed when the organizations finalize and submit their proposed budgets in accordance with this Commission’s direction.

I. NWECC MEETS THE CRITERIA FOR CERTIFICATION.

1. NWECC is a non-profit organization.
2. NWECC represents broad customer interests. It is an alliance of more than 100

organizations, including more than 40 in Washington state, and individual members. The Coalition’s work focuses on energy efficiency, renewable energy, low income and consumer

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projections, and involved public involvement in building a clean energy future, which are matters of broad customer interests in the state of Washington.

3. NWEC can effectively represent the customers that it seeks to represent and in fact routinely participates in proceedings related to PSE customer interests. NWEC staff and members participate in numerous advisory groups convened by PSE, and regularly comments on PSE programs and proposals, including energy efficiency programs, low-income rate programs, transportation electrification programs, and CETA implementation. PSE has intervened without objection in prior Puget Sound Energy rate proceedings and contributed materially to the record and to the settlement of that matter. This Commission previously granted NWEC request for funding in the prior PSE rate case.

4. No other case-certified stakeholder participating in this proceeding adequately represents the specific interests of NWEC. It is the only party focused on the interests of customers as they relate to customer-side resources, energy efficiency, transportation electrification, and clean energy access. The public interest will benefit from NWEC's participation in this proceeding, for example, by allowing the Commission to consider staff and expert testimony on matters central to the Commission's decision. NWEC's consistent participation in past rate cases and other matters before this Commission confirms that the public interest will benefit.

5. NWEC will not unduly delay the schedule for the proceeding and has already worked with other parties to propose an agreed schedule. NWEC and Front and Centered are jointly represented in this matter and will coordinate their participation.

II. FRONT AND CENTERED MEETS THE CRITERIA FOR CERTIFICATION

1. Front and Centered is a non-profit organization.

2. Front and Centered is a Prioritized Organization representing both vulnerable populations and highly impact communities. 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 our coalition members provide direct services and community support to Puget Sound Energy (“PSE”) customers who constitute highly-impacted communities and vulnerable populations.

3. Front and Center will effectively represent its coalition organizations in this proceeding as it does in many other fora. Front and Centered actively participated in Puget Sound Energy’s Clean Energy Implementation Plan (“CEIP”) process and has been involved in PSE’s Equity Advisory Group and participated in discussions on the company’s proposed Bill Discount program. It also participated in PSE’s last rate case and contributed materially to the outcome in that matter. 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. Front and Centered will seek to elevate the voices of historically underrepresented and highly-impacted communities in this process.

For the foregoing reasons, NWECA and Front and Centered respectfully request that the Commission grant this request for case certification and accept its notice of intent to request a fund grant.

Dated this 27th day of March, 2024.

Respectfully submitted,

/s/ Jan Hasselman

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