

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	DOCKET UE-250224
Complainant,	ORDER 09
v.	
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY,	APPROVING PAYMENTS
Respondent.	

**BACKGROUND**

- 1 On April 1, 2025, PacifiCorp d/b/a Pacific Power and Light Company (PacifiCorp or Company) filed with the Washington Utilities and Transportation Commission (Commission) a power cost only rate case in Docket UE-250224.<sup>1</sup>
- 2 On April 10, 2025, the Alliance of Western Energy Consumers (AWEC) filed its Request for Case Certification and Notice of Intent to Request a Fund Grant. On May 8, 2025, The Energy Project (TEP) filed its Petition for Case Certification and Notice of Intent to Request a Fund Grant.
- 3 On July 10, 2025, the Commission entered Order 04, Approving Proposed Budgets and Fund Grants, approving AWEC’s proposed budget and fund grant in the amount of \$80,000 and TEP’s proposed budget and fund grant in the amount of \$35,000 from PacifiCorp’s Customer Representation Sub-Fund.
- 4 On January 5, 2026, TEP filed its Request for Payment of Fund Grant seeking payment of \$35,000. On January 16, 2026, AWEC filed its Request for Payment from the PacifiCorp Customer Representation Sub-Fund Grant seeking payment of \$80,000.

**DISCUSSION**

- 5 Pursuant to Revised Code of Washington (RCW) 80.28.430, utilities must enter into funding agreements with organizations that represent broad customer interests. The

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<sup>1</sup> We note at the outset that AI was used to produce a template for participatory funding orders and to populate portions of this order, prior to further review and issuance.

Commission is directed to determine the amount of financial assistance, if any, that may be provided to any organization; the way the financial assistance is distributed; the way the financial assistance is recovered in a utility's rates; and other matters necessary to administer the agreement.<sup>2</sup>

6 On November 19, 2021, the Commission issued a Policy Statement on Participatory Funding for Regulatory Proceedings in Docket U-210595.<sup>3</sup> On February 24, 2022, the Commission issued Order 01, Approving Agreement with Modifications,<sup>4</sup> and on April 11, 2025, the Commission issued Order 03, Approving Agreement; Subject to Conditions, updating the agreement among the utilities subject to conditions (Third Interim Agreement).<sup>5</sup>

7 As relevant here, the Third Interim Agreement requires that requests for payment itemize expenses, demonstrate that the expenses are reasonable and directly attributable to issues and positions pursued on behalf of customers and consistent with the approved fund grant, provide information sufficient to show compliance with any condition or requirement of the fund grant, and specify whether the request is interim or final payment and whether any approved budget amount may be released back to the applicable sub-fund.<sup>6</sup>

8 The Commission may disallow, in whole or in part, a Request for Payment if it determines that the request seeks reimbursement for (a) expenses that are not Eligible Expenses,<sup>7</sup> or (b) expenses that are inconsistent with the Participating Organization's Consumer Access Fund Grant or any conditions placed on the Consumer Access Fund Grant.<sup>8</sup> Upon authorization of payment, the Commission will make a determination on how to recover the Fund Grants from the various customer classes of the affected Participating Public Utility.<sup>9</sup> Additionally, the Commission may determine whether Fund

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<sup>2</sup> RCW 80.28.430(2).

<sup>3</sup> *In the Matter of the Commission's Examination of Participatory Funding Provisions for Regulatory Proceedings*, Docket U-210595 (November 19, 2021).

<sup>4</sup> *In the Matter of the Petition of Puget Sound Energy, et al.*, Docket U-210595 Order 01 (February 24, 2022).

<sup>5</sup> *In the Matter of the Commission's Examination of Participatory Funding Provisions for Regulatory Proceedings*, Docket U-210595, Order 03 at 6-9 ¶¶ 22, 33-36 (April 11, 2025).

<sup>6</sup> Third Interim Agreement § 6.5.

<sup>7</sup> Third Interim Agreement at 14-15 § 7.3.

<sup>8</sup> Third Interim Agreement at 16-17 § 7.6.

<sup>9</sup> Third Interim Agreement at 17 § 7.7.

Grants that were used to advocate positions on behalf of a broad cross-section of customers should be assessed against all customers or multiple customer classes, to fairly align the costs of the advocacy with the intended potential beneficiaries of the advocacy.

- 9 TEP requests final payment of \$35,000 from PacifiCorp's Customer Representation Sub-Fund. TEP states that it was an active participant in this proceeding on behalf of low-income customers and vulnerable populations, participated in the prehearing conference and settlement conferences, submitted testimony, and filed a brief. TEP's confidential expense exhibit shows eligible expenses of \$36,233.50, outside or in-house resources of \$1,233.50, an approved fund grant budget of \$35,000, and a final request for the full approved grant amount.
- 10 AWEC requests final payment of \$80,000 from PacifiCorp's Customer Representation Sub-Fund. AWEC states that it reviewed the filings in this proceeding, filed two rounds of testimony, attended settlement conferences, attended the hearing, and filed briefs. AWEC's confidential expense exhibit shows eligible expenses of \$118,936.63, outside or in-house resources of \$38,936.63, an approved fund grant budget of \$80,000, and a final request for the full approved grant amount.
- 11 After considering the requirements set forth in Sections 7.1, 7.3, and 7.6 of the Third Interim Agreement, the Commission determines that the requested payments described below should be approved as stated in this Order.
- 12 The requested payments total \$115,000 from PacifiCorp's 2025 Customer Representation Sub-Fund. These amounts are within the previously approved budgets and fund grants for this proceeding.
- 13 The Commission determines that TEP's Request for Payment from PacifiCorp's Customer Representation Sub-Fund should be approved in the amount of \$35,000.
- 14 The Commission also determines that AWEC's Request for Payment from PacifiCorp's Customer Representation Sub-Fund should be approved in the amount of \$80,000.
- 15 Accordingly, considering the breadth and complexity of the issues in this case, the organizations' history before the Commission, and their expertise in representing the customer interests at issue, the Commission finds that the claimed costs are reasonable and directly attributable to participation in this proceeding.

- 16 PacifiCorp must pay the approved Requests for Payment from its Customer Representation Sub-Fund within 30 days of the entry of this Order.<sup>10</sup>

**ORDER**

THE COMMISSION ORDERS:

- 17 (1) The Energy Project's Request for Payment from the 2025 PacifiCorp Customer Representation Sub-Fund is APPROVED in the amount of \$35,000.
- 18 (2) The Alliance of Western Energy Consumers' Request for Payment from the 2025 PacifiCorp Customer Representation Sub-Fund is APPROVED in the amount of \$80,000.

Dated at Lacey, Washington, and effective April 9, 2026.

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

/s/ Bijan Hughes  
BIJAN HUGHES  
Administrative Law Judge

NOTICE TO PARTIES: This is an Interlocutory Order of the Commission. Administrative review may be available through a petition for review, filed within 10 days of the service of this Order pursuant to WAC 480-07-810.

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<sup>10</sup> Third Interim Agreement at 17 § 7.8.