

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-240004 and UG-240005
(Consolidated)

**FRONT AND CENTERED AND
NORTHWEST ENERGY
COALITION’S PROPOSED BUDGETS**

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 proposed budget. Pursuant to Article 5 of the Funding Agreement, NWECA requested certification as a “customer representative organization,” and Front and Centered requested certification as a “prioritized organizations” group. The Commission’s April 22, 2024 Order noted that the presiding judge granted this request.

I. PROPOSED BUDGET

A. Statement of Work

NWECA and Front and Centered, two of the three groups comprising the Joint Environmental Advocates, request a Fund Grant to partially offset the expense of expert consulting services and to partially cover apportioned wages for in-house staff directly related to their participation in this proceeding. NWECA and Front and Centered’s staff and expert witnesses will address various aspects of PSE’s proposed multi-year rate plan, including but not limited to proposed performance metrics, depreciation rates, gas transition plans, electrification spending, and equity provisions. Staff and experts from these groups will sponsor testimony addressing these and other aspects of the rate plan, including

contextualizing the rate plan within legal obligations under the Clean Energy Transformation Act (RCW 19.405) and Climate Commitment Act (RCW 70A.65).

This funding request does not cover the full cost of the organizations' intervention in this proceeding. Additionally, by relying primarily on staff at NWECC and Front and Centered, with only one outside consultant, intervenors are able to provide testimony and engagement at considerably lower than market rates. Finally, NWECC and Front and Centered are represented by pro bono legal counsel and will not seek funding for legal representation.

B. General Areas to Be Investigated

As stated in the Petition to Intervene, NWECC and Front and Centered have broad and diverse interests in this proceeding. NWECC and Front and Centered intervened 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 rate case 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. 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. NWECC and Front and Centered 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.

NWEC and Front and Centered are still reviewing the rate filing and conducting discovery and reserve the right to investigate and address additional issues not stated here.

C. Specific Funds Available

As stated in its Request for Case Certification and Notice of Intent to Request Fund Grant, NWEC requests a Fund Grant from the Customer Representation Sub-Fund of the Customer Access Fund for Puget Sound Energy. Section 4.2 of the Agreement provides for a Customer Representation Sub-Fund of \$200,000 for all parties for all Puget Sound Energy proceedings in 2024. Front and Centered requests a Fund Grant from the Prioritized Organizations Sub-Fund. Section 4.2 of the Agreement provides for a Prioritized Organizations Sub-Fund of \$200,000 for all parties for all Puget Sound Energy proceedings in 2024. At this time, neither group anticipates requesting a Fund Grant for any other PSE proceeding this year.

D. Proposed Budget

NWEC and Front and Centered seek funds to cover outside consultant fees as well as expenses incurred by staff, who will both provide testimony and work with outside consultants. The current proposed budget for outside consultants for the Joint Environmental Advocates is \$50,000. Although eligible, Sierra Club did not seek funding and intends to contribute significantly to this case through coordination and legal strategy. The three organizations comprising the joint environmental advocates propose to share equally the costs of the outside consultant, or \$16,666 per group. Separately, both Front and Centered and NWEC anticipate to use significant staff time to review the filings, provide testimony, and

coordinate with outside experts and other intervenors. Estimates of staff time is based on internal accounting to cover the hourly cost of staff.

As reflected in Exhibit A, attached hereto, NWECC and Front and Centered submits the following estimated budget for its requested Funds Grant.

NWECC Budget:

Share of Expert Witness Fees: \$16,666

Staff Costs: \$ 45,540

Total: \$62,206

Front and Centered Budget

Share of Expert Witness Fees, \$16,666

Staff Costs: \$ 30,850

Total: \$47,516

Respectfully submitted this 2nd day of May, 2024.

Respectfully submitted,

/s/ Jan Hasselman

Jan Hasselman (WA Bar No. 29107)

Earthjustice

810 Third Avenue, Suite 610

Seattle, WA 98104

T: (206) 343-730

jhasselman@earthjustice.org

Attorney for Joint Environmental Advocates

Exhibit A

NWECC Proposed Budget

Personel	Estimated Hours	Hourly Rate	Cost
Regulatory Counsel	100	66	\$6,600
Policy Director	220	66	\$14,520
Policy Associate	180	53	\$9,540
Senior Technical Analyst	240	62	\$14,880
Outside Consultant	Flat		\$16,666
Total			\$62,206.00

Front and Centered Proposed Budget

Personnel	Estimated Hours	Hourly Rate	Cost
Policy Counsel	100	50	\$5,000
Co-Director	50	60	\$3,000
Clean Energy Policy Lead	180	50	\$9,000
Climate Justice Program Manager	70	55	\$3,850
Community experts	50	200	\$10,000
Outside Consultant	Flat		\$16,666
Total			\$47,516.00