

**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*)

ORDER 07

GRANTING LATE-FILED PETITION  
TO INTERVENE

**BACKGROUND**

- 1 On January 31, 2022, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) revisions to its currently effective Tariff WN U-60, Tariff G, Electric Service, and its currently effective Tariff WN U-2, Natural Gas.
- 2 On February 28, 2022, the Commission convened a virtual prehearing conference before administrative law judge Michael S. Howard.
- 3 On March 15, 2022, Front and Centered filed a Petition to Intervene in this proceeding (Petition). Front and Centered explains in its Petition that it is “a climate justice coalition of organizations led by and serving communities of color in Washington.” The coalition represents customers who constitute vulnerable populations and highly impacted communities. Front and Centered submits that it is actively following the implementation of the Clean Energy Transformation Act (CETA)<sup>1</sup> and is involved in PSE’s Equity Advisory Group. Front and Centered states that it has no intention of unreasonably broadening the issues in this proceeding or causing undue delay.
- 4 Front and Centered submits that it has good cause for its late-filed Petition. Front and Centered explains that the organization only recently discovered it has both the interest and capacity to intervene and that this decision “came out of agreement from our

---

<sup>1</sup> See generally RCW chapter 19.405.

member-led leadership structure . . .” Front and Centered states that it will be acting as a *pro se* litigant in this proceeding.

## DISCUSSION

- 5 We grant Front and Centered’s Petition. The Administrative Procedure Act (APA) states that a presiding officer may grant a petition to intervene in an adjudication “upon determining that the petitioner qualifies as an intervenor under any provision of law and that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.”<sup>2</sup> Commission rules provide the presiding officer with discretion to grant intervention “[i]f the petition discloses a substantial interest in the subject matter of the hearing or if the petitioner’s participation is in the public interest.”<sup>3</sup> The Commission may grant a petition to intervene filed after the prehearing conference, or other deadline set by the Commission, “only on a showing of good cause, including a satisfactory explanation of why the person did not timely file a petition to intervene.”<sup>4</sup> In addition, “the presiding officer may impose conditions upon the intervenor’s participation in the proceedings.”<sup>5</sup>
- 6 Front and Centered has demonstrated a substantial interest in this proceeding. The organization credibly submits that it represents vulnerable populations and highly impacted communities,<sup>6</sup> who are most impacted by the effects of climate change. Front and Centered participates in PSE’s Equity Advisory Group and is concerned with the implementation of CETA.
- 7 Front and Centered has established good cause for its late-filed Petition, and no party objected to Front and Centered’s participation. Front and Centered appeared at the prehearing conference in this case and indicated that the organization was still determining whether it would be able to intervene in this proceeding.<sup>7</sup> Front and Centered’s decision to intervene ultimately came out of an agreement from its member-led leadership structure. Because Front and Centered represents a coalition of

---

<sup>2</sup> RCW 34.05.443(1).

<sup>3</sup> WAC 480-07-355(3).

<sup>4</sup> WAC 480-07-355(1)(b).

<sup>5</sup> RCW 34.05.443(2); *accord* WAC 480-07-355(3).

<sup>6</sup> *See* RCW 19.405.020(23) (defining “highly impacted community”). *See also* RCW 19.405.020(40) (defining “vulnerable populations”).

<sup>7</sup> Thuraisingham, TR 15:1-15.

organizations, appeared at the pre-hearing conference, and deliberated over its ability to intervene, we find that the organization established good cause for its late-filed Petition.

- 8 We decline to place any conditions on Front and Centered's participation at this time. No party has objected to this Petition, and Front and Centered submits that it has no intention to broaden the issues or delay the proceeding.

**ORDER**

- 9 **THE COMMISSION ORDERS That Front and Centered's Petition is GRANTED.**

DATED at Lacey, Washington, and effective March 22, 2022.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

*/s/ Michael S. Howard*  
MICHAEL HOWARD  
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.**