

**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)

**NW ENERGY COALITION
PROPOSED BUDGET**

Pursuant to RCW 80.28.430, the Washington Interim Participatory Funding Agreement (“Funding Agreement”) approved by the Washington Utilities and Transportation Commission (the “Commission”),¹ and Order 08 in this docket, NW Energy Coalition (“NWECC”) hereby submits its Proposed Budget for this matter.

I. PROPOSED BUDGET

A. Statement of Work

NWECC hereby requests 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 NWECC’s participation in this proceeding. NWECC’s expert witnesses will address various aspects of Puget Sound Energy’s proposed multi-year rate plan, including but not limited to Puget Sound Energy’s proposed performance metrics, and proposed investments related to Puget Sound Energy’s Clean Energy Implementation Plan (CEIP). NWECC staff will sponsor testimony addressing various aspects of Puget Sound Energy’s multi-year rate plan, including but not limited to Puget Sound Energy’s compliance with Washington state climate and clean energy policy – especially the Washington Clean Energy Transformation Act (Chapter 19.405 RCW) and the Climate Commitment Act (Chapter 70A.65 RCW). All services provided to NWECC by all contractors in this proceeding are being retained at a reduced rate, and the Fund Grant request does not cover the entire cost of NWECC’s participation in this proceeding.

¹ Docket U-210595, Order 01 (February 24, 2022).
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B. General Areas to Be Investigated

As stated in NWEC’s Petition to Intervene, NWEC’s interests in this case include, but are not limited to: 1) Puget Sound Energy’s (“PSE”) request for a rate change; 2) PSE’s performance and associated customer risks related to its infrastructure investments; 3) PSE’s compliance with Washington’s climate and clean energy policies; 4) issues related to PSE’s interest in the Colstrip coal-fired power plant in Montana; 5) PSE’s performance metrics and other Senate Bill 5295 implementation issues; and 6) issues related to customer-side resources, distribution system investment, energy efficiency assistance and other affordability issues for low- and moderate-income customers. NWEC continues to review the multi-year rate plan filing, and conduct discovery, and may address other issues not stated here.

C. Specific Fund/Available Funds

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.² Section 4.2 of the Funding Agreement provides for a Customer Representation Fund of \$200,000 for all parties for all Puget Sound Energy proceedings in 2022. At this time, NWEC does not foresee requesting a Fund Grant for any other Puget Sound Energy proceedings in 2022.

D. Proposed Budget

As reflected in Exhibit A, attached hereto, NWEC submits the following estimated budget for its requested Fund Grants in this matter:

Estimated Expert Consultant/Expert Witness(es):	\$30,000
Estimated Staff Participation Costs:	\$20,000
Total:	\$50,000

² See Funding Agreement § 4.2.
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Estimates for contracted services represent discounted rates for services to NWECC, and do not represent the full market value of these services. Requested amounts also do not include the full cost for NWECC staff to participate in the case and serve as witnesses on issues in which they themselves have expertise. Finally, these amounts do not include any costs for NWECC attorneys' fees.

E. Additional Information Requested By the Commission

Order 08 requested that any proposed budget submitted by NWECC should include an explanation of how any overlapping interests between NWECC and other intervenors, such as TEP, differ and how each intervenor's specific perspectives on these topics are not adequately represented by the other intervenor. Where NWECC's interests overlap with other intervenors, NWECC should explain how the public interest will benefit from the participation of both intervenors.

Both NWECC and TEP have a long history of successful intervention in Washington Utilities and Transportation Commission (Commission) proceedings as separate representatives of their own differing constituencies' interests. NWECC has been granted intervention in numerous dockets in which TEP has also appeared. NWECC is a diverse coalition comprised of over 100 organizations, including TEP amongst almost 50 Washington based organization, and numerous individual members based in Washington. While TEP has a broad interest in every issue that impacts low-income customers, NWECC's interest in low-income issues is more narrow: ensuring that the transformation to clean energy treats low-income customers equitably. While NWECC at times addresses an aspect of low-income program design or rate design, it does not have the same focus on, expertise about, or specific interest in low-income customers as TEP. NWECC does not hold itself out as a principal advocate for low-income customers. For this reason, NWECC cannot adequately represent the interests of low-income customers in the same way as TEP.

Regarding low-income issues, NWECA advocates for clean and affordable energy resources, programs, and services that meet the needs of low-income customers. TEP represents the interests of the Community Action Partnership organizations, which provide low-income energy efficiency and bill payment assistance for clients across Washington State, with a goal of improving affordable access to energy services for low-income households across Washington. While NWECA has a specific focus on clean and affordable energy, TEP evaluates a broader scope of low-income customer issues in general rate proceedings. TEP is a member of NWECA, and NWECA and TEP often agree on various issues related to low-income customers. However, neither organization can represent the others' specific perspective in this proceeding, and it is possible that there may be disagreement between the two organizations on issues in this proceeding as they represent different constituencies. TEP represents the specific interests of the Community Action Agencies and their clients, and low-income customers generally. In contrast, NWECA represents a diverse coalition of organizations and individuals who support an equitable transition to clean and affordable energy that also protects low-income customers.

In past rate case proceedings NWECA and TEP have focused on different issues. For example, in the Avista 2019 rate case (Docket Nos. UE-190334 and UG-190335), NWECA sponsored testimony on the company's revenue decoupling mechanism, gas line extension allowances, energy efficiency programming, and Colstrip obligations, while TEP sponsored testimony on the importance of low-income weatherization and assistance funding to mitigate proposed rate increases. Similarly, it is possible that NWECA and TEP sponsor testimony on different topics in this proceeding. It is also possible that NWECA and TEP sponsor testimony on the same topics, with different perspectives and foci, or advocating for different outcomes for different constituencies.

NWECA and TEP use their best efforts to work together and avoid disagreements, and these efforts are often successful. However, each organization is responsible to a different constituency and disagreement concerning the issues presented in this case is entirely possible. In

the past, TEP and NWECC have taken different positions in both confidential settlement negotiations and in public filings before the Commission. For example, TEP and NWECC have taken different positions in filings on decoupling.³

For the purpose of this Fund Grant request, we also note that NWECC and TEP are seeking fund grants to support expert witness services on different topics. TEP plans to emphasize impacts on low-income and vulnerable customers as a result of PSE's performance-based ratemaking and rate design proposals. NWECC plans to emphasize whether PSE's proposed clean energy investments and proposed rate plan are reasonable, considering the requirements of the Washington Clean Energy Transformation Act and the Climate Commitment Act. The public interest will benefit from the participation and funding of both intervenors because the Commission will hear testimony from a more diverse pool of experts on a broader set of topics, leading to a more thorough and balanced record.

II. CONCLUSION

For the foregoing reasons, the Commission should accept NWECC's proposed budget.

Dated: April 25, 2022.

Respectfully submitted,

/s/ Jaimini Parekh

Jaimini Parekh

Jan Hasselman

Earthjustice

810 Third Avenue, Suite 610

Seattle, WA 98104

Ph: (206) 701-7613

jparekh@earthjustice.org

jhasselman@earthjustice.org

Attorneys for NW Energy Coalition

³ See, e.g., *In re Petition of PSE Corporation, D/B/A PSE Utilities, for an Order Authorizing Implementation of a Natural Gas Decoupling Mechanism and to Record Accounting Entries Associated With the Mechanism*, Docket No. UG-060518, Order 04, Final Order Approving Decoupling Pilot Program (February 1, 2007).