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BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067

PUYALLUP TRIBE OF INDIANS'  
PROPOSED BUDGET

1. Pursuant to section 6.3 of the *Washington Interim Participatory Funding Agreement* (Interim Agreement)<sup>1</sup> and Order 08 in this case, the Puyallup Tribe of Indians (Tribe) hereby submits its Proposed Budget.

2. The Commission granted the Tribe's Request for Case Certification as a Prioritized Organization pursuant to sections 5.2.2 and 6.2 of the Interim Agreement.<sup>2</sup>

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<sup>1</sup> *In the Matter of the Petition of Puget Sound Energy, et al.*, Docket U-210595 Order 01 (February 24, 2022), Attachment A (Executed February 14, 2022).

<sup>2</sup> See *WUTC v. PSE*, Dockets UE-220066 and UG-220067, Order 08 at ¶¶ 34 and 54 (March 24, 2022).

1 **STATEMENT OF WORK TO BE PERFORMED**

2 3. The Tribe has continued a retention of an outside law firm to perform general legal  
3 services, including reviewing documents, drafting materials (including filings with the UTC),  
4 conferring with counsel representing other parties, working with witnesses, and preparing  
5 for/participating in hearings. This same firm represented the Tribe in other litigation, which is  
6 not at issue here, but which resulted in a large amount of relevant document evidence regarding  
7 issues within this rate case, particularly with regard to the prudence of the Tacoma LNG facility.  
8 The documents produced in the other litigation are extremely complicated and voluminous, and  
9 continued representation by the same law firm is necessary as they hold discreet expertise with  
10 regard to the millions of pages of evidence that only a small portion of which will be relevant  
11 in this matter. Retention and use of this firm will be the most efficient way to present evidence  
12 for this proceeding.

13 4. The Tribe has three in-house attorneys that will, in addition to their numerous other  
14 duties representing the Tribe and providing legal counsel to the Tribe, participate at varying  
15 degrees in this case. The Tribe is not budgeting for the cost, which is not insubstantial, of the  
16 in-house attorneys as the Tribe is very aware of additional needs for funds from the limited  
17 funds available to all eligible parties.

18 5. The Tribe is also retaining two experts. The first expert participated in the past litigation  
19 that has given rise to relevant evidence for the prudence of the Tacoma LNG plant, and that  
20 expert will assist in the presentation of evidence in this matter. The second expert is an  
21 economic expert in assessing rates for both electric and gas utilities, and will assist the Tribe  
22 with analysis as to the prudence of the Tacoma Natural Gas Plant. The second expert is  
23 necessary because the Tribe does hold such expertise in house.

1 **DESCRIPTION OF GENERAL AREAS TO BE INVESTIGATED**

2 6. The Tribe intends to limit its investigation to the prudence of the Tacoma LNG Plant  
3 and related matters.

4 **IDENTIFICATION OF SPECIFIC SUB-FUND AND ESTIMATE OF AMOUNT IN**  
5 **THAT ACCOUNT**

6 7. As stated in its Request for Case Certification and Notice of Intent to Request a Fund  
7 Grant, the Tribe intends to request a Fund Grant from the Prioritized Organizations Sub-Fund  
8 of the Consumer Access Fund.

9 8. Pursuant to section 4.2 of the Interim Agreement, PSE shall make available \$100,000.00  
10 to the Prioritized Organizations Sub-Fund account each calendar year during the term of the  
11 Interim Agreement.<sup>3</sup>

12 9. The Tribe does not currently have information upon which to base an estimate of the  
13 amount of available funds in the account, but it has spoken with the other case-certified  
14 Prioritized Organization, and does not believe it is making an unreasonable request.

15 **BUDGET**

16 10. Pursuant to section 6.3 of the Interim Agreement, the Tribe has Attached as Exhibit A  
17 the standardized form approved by the Commission<sup>4</sup>, which contains a line-item accounting of  
18 the Tribe’s estimated outside counsel attorney’s fees and expert witness fees.

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<sup>3</sup> See *Interim Agreement*, Section 4.2, Attachment A to Order 01, Docket U-210595 (Executed February 14, 2022).

<sup>4</sup> See *Exhibit A* to the Interim Agreement.

1 11. The Tribe anticipates spending \$72,700.00 on outside counsel Attorney Fees and  
2 \$52,125.00 on Expert Witness fees and expenses for a total of \$124,825.00 in outside costs in  
3 addition to its own staff attorney time.

4 12. The Tribe's total fund request is for \$75,000.00 recognizing that at least one other  
5 organization may be seeking funds from the Prioritized Organizations Sub-Fund. The Tribe  
6 anticipates that the Commission will apportion any available funding appropriately.

7 13. The Tribe respectfully requests the Commission to accept the Tribe's Proposed Budget  
8 and issue an order granting a Fund Grant in the amount specified above.

9  
10 Signed this 25th day of April, 2022.

11 PUYALLUP TRIBE OF INDIANS

12 s/ Lisa A.H. Anderson, WSBA #27877

13 s/ Alec S. Wrolson, WSBA #54076

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20  
21 **Attorneys for Appellant Puyallup Tribe of Indians**  
22  
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**EXHIBIT A**  
**Form of Budget Request**

PUYALLUP TRIBE OF INDIANS Proposed Budget for  
Issue Fund Grant

Personnel	Hours	Rate	Cost
<i>Attorney Fees</i>			
Senior Attorney	190	\$330/hour	\$62,700
Attorney	40	\$250/hour	\$10,000
Paralegal			
<i>Expert Witness Fees</i>			
Expert 1	25	285/hour	\$7,125
Expert 2	N/A	Estimate for Project Team	\$45,000
<b>TOTAL:</b>			<b><u>\$124,825</u></b>

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**Total PUYALLUP TRIBE OF INDIANS Fund Request: \$75,000.00**