

From: [Sommer J. T. Moser](#)
To: ["Rick Aramburu"](#); SIMON@FFITCHLAW.COM; jhasselman@earthjustice.org; lauren@nwenergy.org; [Yochi Zakai](#); [Shawn Collins](#); jparekh@earthjustice.org; lauren@nwenergy.org; amy@nwenergy.org
Cc: [Brent L. Coleman](#)
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts
Date: Monday, April 11, 2022 9:32:00 AM

Mr. Aramburu,

Happy to answer your question. AWEC designated its membership list by PSE customer as confidential in this case pursuant to WAC 480-07-160(5) and RCW 80.04.095, and per the protective order in place in the dockets. Hope this helps.

If you have additional questions about AWEC and its participation in this case, please feel free to give me a call at the number below.

Thanks.

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Davison Van Cleve PC
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From: Rick Aramburu <Rick@aramburu-eustis.com>
Sent: Friday, April 8, 2022 1:14 PM
To: Sommer J. T. Moser <sjm@dvclaw.com>; SIMON@FFITCHLAW.COM; jhasselman@earthjustice.org; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn Collins <shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org; amy@nwenergy.org
Cc: Brent L. Coleman <blc@dvclaw.com>
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts

Ms. Moser:

Thank you for your rapid response; this information will be useful in preparing our funding budget.

I had one other question. I see that you have list the large corporations you represent as confidential in your amended intervention motion. On what basis should the AWEC members that are PSE customers be considered confidential? I notice that there was full disclosure of AWEC member in the 2019 rate case.

Thanks for the information.

Rick

From: Sommer J. T. Moser <sjm@dvclaw.com>
Sent: Thursday, April 07, 2022 4:22 PM
To: Rick Aramburu <Rick@aramburu-eustis.com>; SIMON@FFITCHLAW.COM;
jhasselman@earthjustice.org; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn Collins <shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org;
amy@nwenergy.org
Cc: Brent L. Coleman <blc@dvclaw.com>
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts

Mr. Aramburu,

Thank you for your reply and feedback. I'm happy to do what I can to help answer your questions and address your concerns.

From my perspective, the Commission has already determined which organizations are eligible to seek funding in this case, and so the only remaining issue is to submit budgets that demonstrate the scope of work and corresponding costs. I understand that Section 6.6 of the Interim Funding Agreement allows for parties to combine efforts and resources in a case, and therefore, that might inform the budget that other parties intend to seek. For what it's worth as you consider what to include in CENSE's request, AWEC's approach when developing a case budget is to generally assume a fully litigated case. To that end, AWEC is still evaluating the case and has not reached final positions on any matters at this early time, but I am nearly certain AWEC will not actively support PSE getting rate recovery for its Energy Eastside project—it seems much more likely that we would either oppose cost recovery (at some amount) or take no position at all. But you are correct that AWEC will review the Energize Eastside project, along with all other aspects of PSE's case, to determine whether such costs are prudent and reasonable and resulting rates are fair, just and reasonable.

More broadly, our thought was that with four organizations and a total budget of \$200,000, it would be reasonable for AWEC to seek \$50,000 (1/4 of the available funds), given that we intend to put on a full revenue requirement case. AWEC's costs will very likely substantially exceed \$50,000. As I also mentioned in my prior e-mail, AWEC does not intend to request funding in any other PSE case this year.

I'm happy to discuss further if you have any questions. Thanks again for your response.

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From: Rick Aramburu <Rick@aramburu-eustis.com>
Sent: Thursday, April 7, 2022 1:57 PM
To: Sommer J. T. Moser <sjm@dvclaw.com>; SIMON@FFITHLAW.COM;
jhasselman@earthjustice.org; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn Collins <shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org;
amy@nwenergy.org
Cc: Brent L. Coleman <blc@dvclaw.com>
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts

Dear Ms. Moser:

Thank you for your email. CENSE is still considering the funding budget for its participation, but we do have a couple of questions. As you know, CENSE participation is limited to issues related to the Energize Eastside project.

Given that AWEC represents large industrial consumers within the PSE service area, we would assume that AWEC would support efforts to not include the Energize Eastside project in the PSE rate base if the proposal does not meet prudency standards. However, AWEC opposed CENSE's request for case certification saying that the Energize Eastside issue "will also be addressed by other organizations that have a history of advocating for broad consumer interests before the Commission, such as Public Counsel, AWEC and the Energy Project." Response at 7. Could you let us know what position AWEC will be taking on the Energize Eastside project?

In its response, AWEC also stated:

"Allowing CENSE to reserve a portion of this limited funding to advance its narrow interests in this proceeding will necessarily reduce the effectiveness of other parties eligible for funding that present broader interests and intend to address issues of broader scope, which is contrary to the public interest."

We assume that one of the "other parties" that might have their effectiveness reduced is

AWEC.

In this regard, we note that one of the AWEC members is the Boeing Company, which was listed as a member during the 2019 rate case. Boeing is a member of a pro-Energize Eastside lobbying group called "Communities United for Reliable Energy" or "CURE" which maintains this website: <https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.communitiesunitedforreliableenergy.org%2F&data=04%7C01%7CRick%40aramburu-eustis.com%7Ca8d34d2f80254ab3559b08da18cf8f35%7C15fddfa5bc104422aeded19095d143cd%7C1%7C0%7C637849577590669179%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000&data=pu4COU0A6MpaXfB5NsQ0s5VXone3jKmNAEXwZOZib0U%3D&reserved=0>

The "CURE" website lists Boeing as one of its business members (<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.communitiesunitedforreliableenergy.org%2Fbusinesses--community-organizations.html&data=04%7C01%7CRick%40aramburu-eustis.com%7Ca8d34d2f80254ab3559b08da18cf8f35%7C15fddfa5bc104422aeded19095d143cd%7C1%7C0%7C637849577590669179%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000&data=0%2BtNibUa7%2BHyLPbqpljlczyxFK8rHGsjTD4Oxx%2FDCak%3D&reserved=0>) and includes the members of the "CURE Steering Committee," which includes: "Rich White, Boeing, Everett Resident." <https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.communitiesunitedforreliableenergy.org%2Fcure-steering-committee.html&data=04%7C01%7CRick%40aramburu-eustis.com%7Ca8d34d2f80254ab3559b08da18cf8f35%7C15fddfa5bc104422aeded19095d143cd%7C1%7C0%7C637849577590669179%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000&data=FEsHCuZrLFeVyClXBTJv3HeQjtqID2AyGfxNGKHvFGM%3D&reserved=0>

In bold print on the CURE home page of its website is the following: "**We support Puget Sound Energy's Energize Eastside project.**" CURE is referenced as an Energize Eastside supporter on materials submitted to the Commission by PSE. Exhibit DRK-23r2, page 19.

In light of the foregoing, will AWEC be supporting the Energize Eastside project before the Commission? If so, CENSE will need to include this opposition in its budget funding to address AWEC's position. In a broader sense, why should an organization funded by a large company be taking funds from non-profit organizations representing consumer interests?

Thank you for this opportunity to consult with other parties concerning the provisions of Section 6.6. If you have questions, please let me know.

J. Richard Aramburu
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705 Second Ave Suite 1300
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From: Sommer J. T. Moser <sjm@dvclaw.com>
Sent: Tuesday, April 05, 2022 2:04 PM
To: Rick Aramburu <Rick@aramburu-eustis.com>; SIMON@FFITCHLAW.COM;
jhasselman@earthjustice.org; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn
Collins <shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org;
amy@nwenergy.org
Cc: Brent L. Coleman <bhc@dvclaw.com>
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts

Thank you, Richard.

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From: Rick Aramburu <Rick@aramburu-eustis.com>
Sent: Tuesday, April 5, 2022 1:45 PM
To: Sommer J. T. Moser <sjm@dvclaw.com>; SIMON@FFITCHLAW.COM;
jhasselman@earthjustice.org; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn
Collins <shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org; amy@nwenergy.org
Cc: Brent L. Coleman <bhc@dvclaw.com>
Subject: RE: PSE Dockets 220066-67 Stakeholder Funding Amounts

Ms. Moser:

I am occupied with other matters today, but will be back to you tomorrow or Thursday at the latest.

Richard Aramburu

From: Sommer J. T. Moser <sjm@dvclaw.com>
Sent: Monday, April 04, 2022 1:18 PM
To: SIMON@FFITCHLAW.COM; jhasselman@earthjustice.org; Rick Aramburu <Rick@aramburu-eustis.com>; lauren@nwenergy.org; Yochi Zakai <yzakai@smwlaw.com>; Shawn Collins
<shawnc@oppco.org>; jparekh@earthjustice.org; lauren@nwenergy.org; amy@nwenergy.org

Cc: Brent L. Coleman <blc@dvclaw.com>

Subject: PSE Dockets 220066-67 Stakeholder Funding Amounts

All,

I am reaching out on behalf of AWEC to coordinate on stakeholder funding amounts for PSE's general rate case among organizations that intend to seek funds from the Customer Representation Sub-Fund. AWEC intends to ask for \$50,000 given the number of issues and complexity of the case, which represents 25% of available customer funds. AWEC will not seek stakeholder funding in any other PSE proceeding this year. We'd like to understand if there are concerns with AWEC's request in this case, and to generally coordinate in accordance with Section 6.6 of the Interim Participatory Funding Agreement. Please let me know if you have any questions or if there's a more ideal way to coordinate.

Thanks.

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