

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230968

**CLIMATE SOLUTIONS, NW ENERGY
COALITION, AND WASHINGTON
CONSERVATION ACTION'S
PETITION TO INTERVENE**

1. Pursuant to WAC 480-07-355, Climate Solutions, NW Energy Coalition (“NWEC”), and Washington Conservation Action (“WCA”), (collectively “Joint Environmental Advocates”), hereby petition the Washington Utilities and Transportation Commission (“UTC” or “Commission”) for leave to intervene in the above-referenced docket as intervenors with full party status, as described in WAC 480-07-340. Business addresses and contact information for purposes of service are as follows:

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NW Energy Coalition
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2. Joint Environmental Advocates will be represented in this proceeding by Earthjustice. All documents relating to this proceeding should additionally be served electronically on Joint Environmental Advocates' attorneys at the following addresses:

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Joint Environmental Advocates do not request paper service, unless required by UTC rules or law. If permitted by the presiding officer, Joint Environmental Advocates also request that electronic service be provided to the following:

Diana Brechtel
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4. Climate Solutions is a regional nonprofit working to accelerate clean energy solutions to the climate crisis, with over 17,000 supporters in the Pacific Northwest and nearly 8,000 of those located in Washington State. NWEC is a nonprofit alliance of over 100 environmental, civic, and human services organizations, utilities, and businesses in the Northwest advancing clean, equitable, and affordable energy policies by providing technical and policy leadership on energy issues in the region. WCA is a nonprofit that uses statewide, collaborative efforts to promote equitable systems that ensure Washingtonians live in a healthy and just environment, community, and economy.

5. Joint Environmental Advocates have a substantial interest in PSE's proposed revisions to rates under natural gas Schedule 111, Greenhouse Emissions Cap and Invest Adjustment, the purpose of which is to recover Climate Commitment Act ("CCA") allowance costs and pass back auction proceeds. Because of substantial issues with the tariff as filed, outlined below, Joint Environmental Advocates will recommend suspension at the Commission's next open meeting.

6. Joint Environmental Advocates, as well as other interested parties and the Commission itself, have recognized the importance of incorporating a risk-sharing mechanism for CCA compliance. While PSE's goal of allocating some funds towards decarbonization for low-income clients is a laudable step that Joint Environmental Advocates support, that proposal does not suffice as a risk-sharing model. The tariff as filed is equivalent to the Company's pass-through approach in UG-230470 and is therefore inadequate. A simple pass-through with no provision for risk-sharing substantially and directly affects Joint Environmental Advocates' members who take natural gas service from PSE, as well as the interests of Joint Environmental Advocates as organizations whose missions center on averting the climate crisis and promoting a clean and healthy environment for communities, in part through ensuring that regulated entities' compliance with Washington's climate and clean energy policies contributes to a necessary and substantial reduction in statewide greenhouse gas emissions. Joint Environmental Advocates' historic and ongoing work with utility companies and others to achieve their missions demonstrate that Joint Environmental Advocates possess a substantial interest in the outcome of the proceeding.

6. Joint Environmental Advocates have extensive experience in proceedings before the Commission involving PSE. NWECA has participated in PSE's accounting orders and tariff

requests related to the CCA (Docket UG-220975) and PSE's last IRP (UG-200305); Climate Solutions and NWECA participated in the Company's last general rate case (Docket UG-220067/UE220066); and all three organizations submitted comments in a CCA-related tariff revision (Docket No. UG-230470) and in the CCA policy workshops (Docket U-230161). Joint Environmental Advocates' expertise in resource planning, industry structure, economic and policy analysis, as well as environmental and community advocacy, will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

7. Joint Environmental Advocates' interests in the proceeding will not be adequately represented by any other party and may be affected by any Commission determination made in connection with this proceeding. Accordingly, it is in the public interest to allow intervention.

8. For the foregoing reasons, Joint Environmental Advocates respectfully petition the Commission for leave to intervene in this proceeding.

Dated this 18th day of December, 2023.

Respectfully submitted,

/s/ Noelia Gravotta

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