

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY, INC.

2021 Clean Energy Implementation Plan

DOCKET NO. UE-210795

**NW ENERGY COALITION AND
FRONT AND CENTERED
PETITION TO INTERVENE**

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, the NW Energy Coalition (“NVEC”) and Front and Centered petition the Washington Utilities and Transportation Commission (the “Commission”) to intervene in the above-captioned proceeding with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, NVEC and Front and Centered state as follows:

2. The name and address of NVEC are:

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3. The name and address of Front and Centered are:

Mariel Thuraingham
Front and Centered
1501 East Madison Street, Suite 250
Seattle, WA 98122
mariel@frontandcentered.org

4. NVEC and Front and Centered will be represented in this proceeding by Earthjustice. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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5. NWEC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NWEC’s primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. NWEC provides technical and policy leadership on energy issues in this region, and seeks to promote the development of renewable energy, energy conservation, and affordable energy services. Due to its historic and ongoing work with utility companies and others to achieve these goals, NWEC possesses a substantial interest in the outcome of this proceeding.

6. NWEC has a special interest in this proceeding for the following reasons, including but not limited to: 1) members of NWEC have a direct and substantial interest in Puget Sound Energy’s (“PSE”) plan to transition to a clean and equitable energy future; 2) the proposed clean energy and equity plan could impact PSE’s performance and associated customer risks related to its infrastructure investments; 3) PSE’s planned resource acquisitions should comply with Washington’s climate and clean energy policies; and 4) the proposed Customer Benefit Indicators and associated actions could impact issues related to customer-side resources, distribution system investment, energy efficiency assistance, and other affordability issues for low- and moderate-income customers.

7. In each of these areas NWEC intends to focus its participation on examining whether PSE’s filing complies with the Clean Energy Transformation Act (“CETA”) and implementing regulations. NWEC has been actively engaged in this docket, filed comments on

the Draft CEIP in this docket on November 1, 2021, and filed multiple comments on PSE's 2021 Integrated Resource Plan (Dockets UE-200304/UG-200305). NWEC staff and members also participated in meetings concerning the CEIP with PSE's IRP Technical Advisory Group, Conservation Resources Advisory Group, and Low-income Advisory Group. NWEC also joined with the Public Counsel Unit of the Attorney General's Office, The Energy Project, and Front and Centered in submitting a Joint Proposal on Customer Benefit Indicators. That proposal was originally filed on July 30, 2021 in Docket UE-210297 (PSE's Public Participation Plan), and refiled in this docket on November 5, 2021.

8. NWEC intends to continue to examine issues it has raised previously in this docket, and other issues in this proceeding.

9. NWEC offers this process considerable expertise in the areas of resource planning, industry structure, and economic and policy analysis. NWEC has participated in numerous rate cases, mergers, resource planning, and other similar proceedings in Washington, Oregon, Idaho, and Montana.

10. Front and Centered is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. Front and Centered is a climate justice coalition of organizations led by and serving communities of color in Washington. Front and Centered's mission is to advocate for the interests of frontline communities who are first and worst impacted by the climate crisis, particularly low-income and BIPOC communities, in advancing a just and equitable transition from an extractive to a regenerative economy. A large number of Front and Centered's coalition members provide direct services and community support to PSE customers who constitute highly impacted communities and vulnerable populations.

11. Front and Centered is actively engaged in the implementation of CETA and has already participated extensively in Puget Sound Energy's Clean Energy Implementation Plan

(“CEIP”) process. Front and Centered has also been involved in PSE’s Equity Advisory Group and participated in discussions on the company’s proposed Bill Discount program. A number of stakeholders, including Front and Centered, have advocated extensively for the adoption and enforcement of strong customer programming and protection measures to reinforce CETA’s energy assistance mandate and to secure equitable access to essential energy services with dignity in times of public health and economic crisis. Due to Front and Centered’s interest in the process and outcomes of PSE’s CEIP with respect to clean transition and equitable access goals, Front and Centered is well positioned to provide informed and useful perspectives on key issues being raised.

12. Front and Centered will seek to elevate the voices of historically underrepresented and highly impacted communities in this process.

13. NWECC and Front and Centered have no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through their intervention.

14. It is in the public interest to allow NWECC and Front and Centered to intervene in this proceeding.

15. For the foregoing reasons, NWECC and Front and Centered respectfully petition the Commission for leave to intervene in this proceeding.

Dated this 3rd day of May, 2022.

Respectfully submitted,

/s/ Amanda Goodin

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