

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKETS UE-220066, UG-220067 and UG-210918 (<i>Consolidated</i>)
)	
Complainant,)	
)	
v.)	ALLIANCE OF WESTERN ENERGY CONSUMERS' REQUEST FOR PAYMENT OF PUGET SOUND ENERGY CUSTOMER REPRESENTATION SUB-FUND GRANT
PUGET SOUND ENERGY)	
)	
Respondent.)	
)	
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1 Pursuant to Article 7.1 of the Washington Interim Participatory Funding Agreement (“IPFA”) approved by the Washington Utilities and Transportation Commission (“Commission”) in Order 01 in Docket U-210595, the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s Puget Sound Energy Customer Representation Sub-Fund Grant in the amount of \$50,000.

2 On January 31, 2022, Puget Sound Energy (“PSE”) filed its request for a general rate revision for both its gas and electric service. The Commission docketed these filings as UE-220066 and UG-220067 (“Proceeding”).

3 On March 14, 2022, as required by Article 6.2 of the IPFA, AWEC filed its Request for Case Certification and Notice of Intent to Request a Fund Grant, which was also served on PSE and all parties of record in the Proceeding. In that filing, AWEC identified the

PSE Customer Representation Sub-Fund as the account from which AWEC intended to request a Fund Grant.

4 On March 24, 2022, the Commission granted AWEC’s Request for Case Certification, finding that AWEC demonstrated it is a non-profit organization that represents broad customer interests,¹ that “it can effectively represent the particular customers it seeks to represent,”² and that “the public interest is served by AWEC’s participation and [] no other party adequately represents the interests of industrial customers.”³

5 On April 22, 2022, AWEC filed its Proposed Budget in this Proceeding, showing total estimated expenses of \$200,000 and seeking a Puget Sound Energy Customer Representation Sub-Fund Grant in the amount of \$50,000. The Commission issued Order 16/02 in these Dockets on May 26, 2022, approving a Puget Sound Energy Customer Representation Sub-Fund Grant for AWEC in the amount of \$50,000.

6 Article 4.5 of the IPFA provides that “certain expenditures incurred pursuant to a Commission-authorized Fund Grant awarded before termination [of the IPFA] may be reimbursed according to the terms specified in Section 9.3.” Pursuant to Section 9.3 of the IPFA, “[t]ermination of this [IPFA] (under this Section or at the end of the Term of this [IPFA]) shall not discharge or relieve any Party from any obligations or liabilities which may have accrued under the terms of this [IPFA] before such termination. In particular, the Commission shall require the Participating Public Utility or Utilities to pay Eligible Expenses incurred under a

¹ Dockets UE-220066 and UG-220067, Order 8 at ¶ 24 (March 24, 2022).

² *Id.* at ¶ 25.

³ *Id.*

Commission-authorized Fund Grant that was awarded before the date of termination, subject to satisfaction of the requirements in Article 7.” Accordingly, while the current IPFA terminated on December 31, 2022,⁴ AWEC is entitled to reimbursement of its Eligible Expenses incurred under its Commission-authorized Fund Grant, provided that AWEC has satisfied the requirements of Article 7 of the IPFA.

7 At this time, AWEC requests that the Commission authorize final payment of AWEC’s approved Sub-Fund Grant in Dockets UE-220066 and UG-220067 in the amount of \$50,000 from the 2022 Puget Sound Energy Customer Representation Sub-Fund.

8 This Request for Payment satisfies the requirements of the IPFA as follows:

Article 7.1(a) – The itemized expenses, payees, and hourly rates – including separately identified amounts for consultant or expert witness fees and travel expenses – are attached as Confidential Exhibit A.

Article 7.1(b) – AWEC has been an active participant in this Proceeding. AWEC reviewed the filings in this Proceeding, conducted discovery, filed testimony, participated in settlement discussions, and filed a brief. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC’s participation in Dockets UE-220066 and UG-220067.

Article 7.1(c) – As set forth in this Request for Payment, AWEC has provided information sufficient to demonstrate that AWEC has complied with all conditions and requirements of its approved Sub-Fund Grant.

⁴ IPFA, Article 2. On December 20, 2022, Parties filed their Joint Petition for Approval of the Washington Extended Interim Participatory Funding Agreement, which is awaiting a Commission decision.

Article 7.1(d) – This Request for Payment constitutes a Request for Final Payment for the full amount of AWEC’s approved budget in this Proceeding.

9 Accordingly, AWEC has satisfied the terms of the IPFA and respectfully requests that the Commission approve AWEC’s Request for Final Payment in the amount of \$50,000 from the 2022 Puget Sound Energy Customer Representation Sub-Fund within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the IPFA.

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers
c/o Tyler C. Pepple
Davison Van Cleve, P.C.
1750 S Harbor Way, Suite 450
Portland, OR 97201

10 Dated this 13th day of January, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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