

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066, UG-220067,
UG-210918 (*Consolidated*)

**FRONT AND CENTERED'S
REQUEST FOR PAYMENT OF
FUND GRANT**

1 Pursuant to Order 06 in Docket Nos. UE-220066 and UG-220067 Granting Requests for Case Certification issued by the Washington Utilities and Transportation Commission (“UTC”) and Order 16-02 Approving Proposed Budgets in the same dockets, Front and Centered hereby respectfully requests payment of a Fund Grant from the Customer Access Fund for Puget Sound Energy (“PSE”)¹ in the amount of \$15,000. In support of this request, Front and Centered states the following:

2 On January 31, 2022, PSE filed its request for a multi-year general rate revision for electric and natural gas distribution in its Washington service territory.

3 On March 15, 2022, Front and Centered intervened in this case, and filed a Request for Case Certification and Notice of Intent to Request a Fund Grant (Notice and Request). On March 22, 2022, the Commission granted Front and Centered’s request for intervention, and on March 24, 2022, the Commission approved its request for case certification.²

4 Front and Centered is a membership-based coalition. Front and Centered’s members include: A. Philip Randolph Institute, Afghan Health Initiative, Africans on the Eastside, Africatown Community Land Trust, Africatown International, Asia Pacific Cultural Center, Asian Counseling and Referral Service, Asian Pacific Islander Coalition (APIC) Spokane, Asian

¹ See *Petition for approval of an interim participatory funding agreement pursuant to RCW 80.28.430*, Docket U-210595 Order 01 (February 24, 2022), Attachment A § 4.2 (Executed February 24, 2022) (hereinafter “Funding Agreement”).

² Order 08, Granting Requests for Case Certification (Mar. 24, 2022).

Pacific Islander Coalition (APIC) Yakima, Bayan USA, BMAC (BIPOC Mobility Action Coalition), Casa Latina, CIELO (Centro Integral Educativo Latino de Olympia), Coalition of Immigrants and Refugees and Communities of Color, Colectiva Legal del Pueblo, Community Development and Outreach Service Ministries, Community Health Worker Coalition for Migrants and Refugees, Community to Community Development, Duwamish River Community Coalition, Eastside Baptist Church, ECOSS, El Centro de la Raza, Entre Hermanos, Familias Unidas por la Justicia, FEEST Seattle, Gather Together Grow Together, Global African Community Initiative, Goodwill Baptist Church, Got Green, Kitsap Black Student Union, La Casa Hogar, Latino Community Fund, Latinos en Spokane, LELO, Mason County Climate Justice, Mother Africa, Na’ah Illahee Fund, NAACP Spokane Chapter, NAACP Tacoma Chapter, Nuestra Casa, OneAmerica, Peace Works United, PEARS (People Empowerment and Renewal Services), Plant Based Food Share, Puget Sound Sage, Rainier Valley Corps, Refugee & Immigrant Services Northwest, Revive Center for Returning Citizens, Shiloh Baptist Church, Tacoma Ministerial Alliance, Urban League of Metropolitan Seattle, UTOPIA Washington, Washington Family Engagement, Washington State Coalition of African Community Leaders, Wing Luke Museum of the Asian Pacific American Experience, and Young Warrior Society.

5 On April 25, 2022, Front and Centered filed a Proposed Budget and requested a Fund Grant in this docket in the amount of \$15,000 to partially offset the costs of its participation in the proceeding. The Commission approved Front and Centered’s Proposed Budget for a Fund Grant in the amount of \$15,000 on May 26, 2022.³

6 Front and Centered focused on all matters related to the financial impact to low-income, vulnerable, and highly impacted customers from PSE’s proposed rate increase, the environmental justice consequences of PSE’s proposed investments, programs and bill impacts to low-income and vulnerable customers, including low-income assistance program funding and design, and performance-based regulation of PSE’s energy utility services.

³ Order 16-02, Approving Proposed Budgets (May 26, 2022).

7 Front and Centered respectfully submits that this request for payment satisfies the requirement of the Funding Agreement § 7.1 as follows:

- a. The request for reimbursement is timely. The Funding Agreement provides that a “Request for Payment for Customer Access Funds may be made at the conclusion of an Eligible Proceeding, and, when applicable, no later than 60 days after the Commission’s final order issued in the Eligible Proceeding has become final and non-appealable.” The Commission issued its final order on December 22, 2022.⁴ Under the Washington Administrative Procedure Act, an appeal for judicial review of a final order must be filed within 30 days.⁵ The final order in this case became non-appealable on January 23, 2023. Front and Centered filed this request for reimbursement within 60 days of when the final order became non-appealable.
- b. Section 7.1(a). The itemized expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert fees and travel expenses are attached as Confidential Exhibit A.
- c. Section 7.1(b). Front and Centered was a full and active participant in this docket and the expenses are reasonable and directly attributable to issues and positions pursued on behalf customers addressing the impacts of PSE’s proposed investments on highly impacted, and vulnerable customers, as well as the environment. Front and Centered issued and reviewed discovery, participated in settlement conferences, participated in several prehearing/status conferences, reviewed testimony of other parties; prepared for and attended an evidentiary hearing and filed a closing brief. The expenses included in Confidential Attachment A are Eligible Expenses as defined in Funding Agreement Sections 7.3 and 7.4, and are reasonable and directly attributable to Front and Centered’s participation in UG-220067 and UE-220066 on behalf of low-income customers and vulnerable populations.

⁴ Order No. 24.

⁵ RCW 34.05.542.

- d. Section 7.1(d). This request is a final request for payment under this Approved Fund Grant for the full amount of the Approved Fund Grant.
- e. Sections 7.3 & 7.4. All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.3 and 7.4 of the Funding Agreement.
- f. The Funding Agreement provides that a Participating Organization may request reimbursement “for purposes of conducting general outreach and developing awareness of participation opportunities for vulnerable populations and highly impacted communities, irrespective of any particular docket or proceeding before the Commission.”⁶ In its budget request, Front and Centered requested funds to support and outreach and community consultation with its members to elevate their voices and needs in this proceeding. Specifically, Front and Centered stated the following in its April 25, 2022 budget request:

Front and Centered is a coalition of over 85 organizations led by and serving communities of color in Washington state, and many of these communities live and work in territory occupied by Puget Sound Energy (“PSE”) services and operations. The attached budget (Exhibit A) includes *the costs of completed and anticipated staff time and coalition consultations* dedicated to this proceeding as requested for Commission approval to offset expenses incurred.⁷

- g. Front and Centered conducted the following coalition consultation activities to support its participation in this case:

Front and Centered convened 12 workgroup sessions with coalition members interested and engaged in expanding access to clean and affordable energy in their communities. In these energy justice workgroup sessions, attended by up to 10 member organization representatives at a time, a regular topic of discussion was utility access and the clean energy transition, with attention to regulatory matters that Front and Centered was involved in, including this rate case. Front and

⁶ Funding Agreement, § 7.4.

⁷ Front and Centered, Proposed Budget (Filed April 25, 2022).

Centered circulated updates to the membership on the progress of the regulatory docket with respect to confidentiality constraints and hosted member-wide policy assemblies where energy justice work was presented, with particular attention to proposed rate increases, discount rates, and other key issues in this case. Involved members shared known and anecdotal experiences from their communities related to affordability, understanding utility resource planning and fuel types, and barriers to participation and limited awareness of utility programs.

8 Upon approval of this request for payment by the Commission, please send payment to Front and Centered as follows:

Front and Centered Coalition
1501 East Madison Street, Suite 250
Seattle, WA 98122

9 Front and Centered has satisfied the terms of the Funding Agreement and respectfully requests that the Commission approve payment of Front and Centered's Fund Grant in the amount of \$15,000 from the PSE Customer Representation Sub-Fund within 30 days of receiving this Request for Payment as provided in Section 7.6 of the Funding Agreement.

Dated this 8th day of March, 2023.

/s/ Jaimini Parekh

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