

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKETS UE-240004 and
TRANSPORTATION COMMISSION,	)	UG-240005 ( <i>Consolidated</i> )
	)	
Complainant,	)	
	)	
v.	)	ALLIANCE OF WESTERN ENERGY
	)	CONSUMERS' REQUEST FOR
PUGET SOUND ENERGY,	)	PAYMENT OF PUGET SOUND
	)	ENERGY CUSTOMER
Respondent.	)	REPRESENTATION SUB-FUND
	)	GRANT

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1                   Pursuant to Article 7.1 of the Washington Extended Interim Participatory Funding Agreement (“IPFA”) approved by the Washington Utilities and Transportation Commission (“Commission”) in Order 02 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 \$73,897.00.

2                   On February 15, 2024, Puget Sound Energy, (“PSE” or the “Company”) filed its request for a general rate revision for its electric and natural gas service. The Commission docketed these filings as UE-240004 and UG-240005. On March 5, 2024, the Commission issued Order 01 in this proceeding, consolidating Dockets UE-240004 and UG-240005; on March 29, 2024, the Commission issued Order 03/01 consolidating Docket UE-230810 with the general rate case.

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DAVISON VAN CLEVE, P.C.  
107 SE Washington Street, Suite 430  
Portland, OR 97214  
Telephone: (503) 241-7242

3                   On February 26, 2024, 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 May 2, 2024, AWEC filed a Proposed Budget with the Washington Utilities  
and Transportation Commission (“Commission”), requesting a Fund Grant of \$68,897.00 from  
the PSE Customer Representation Sub-Fund to partially offset the costs of AWEC’s participation  
in this proceeding. On May 15, 2024, AWEC’s request for Case Certification and its Proposed  
Budget were approved by the Commission in Order 06/04 in the full amount of \$68,897.00.

5                   On June 14, 2024, pursuant to Article 4.2.4 of the IPFA, AWEC filed a Petition to  
Increase Customer Representation Sub-Fund by \$5,000 to offset the cost of procuring an Aurora  
license to audit PSE’s power costs. As stated in that petition, all affected parties supported  
AWEC’s petition to increase the Customer Representation Sub-Fund to account for the cost of  
the Aurora license.<sup>1</sup> As of the filing of this Request for Payment, the Commission has not ruled  
on AWEC’s petition to increase the Customer Representation Sub-Fund. Accordingly, AWEC  
requests that the Commission approve that petition concurrently with any decision to approve  
AWEC’s Request for Payment.

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<sup>1</sup> AWEC Petition to Increase Customer Representation Sub-Fund ¶ 4 (June 14, 2024). AWEC’s Petition also noted that PSE did not support AWEC’s position that, in the future, the cost of power modeling licenses should be borne by utilities, not customers. *Id.*

At this time, AWEC requests that the Commission approve its Petition to Increase the Customer Representation Sub-Fund and authorize final payment of AWEC's approved Sub-Fund Grant in the amount of \$73,897.00 from the 2024 PSE Customer Representation Sub-Fund. 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, participated in the evidentiary hearing, and filed a brief. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in Dockets UE-240004 and UG-240005.

**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.

**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 (assuming AWEC's Petition to Increase the Customer Representation Sub-Fund is approved).

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As demonstrated herein, 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 \$73,897.00 from the 2024 PSE 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 Sommer J. Moser  
Davison Van Cleve, P.C.  
107 SE Washington Street, Suite 430  
Portland, OR 97214

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Dated this 3rd day of February, 2025.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser  
Davison Van Cleve, P.C.  
107 SE Washington Street, Suite 430  
Portland, OR 97214  
E-Mail: sjm@dvclaw.com  
Telephone: (503) 241-7242  
Of Attorneys for the  
Alliance of Western Energy Consumers

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DAVISON VAN CLEVE, P.C.  
107 SE Washington Street, Suite 430  
Portland, OR 97214  
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