

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY

Gas Climate Commitment Act Tariff WN U-2
Revision.

In the Matter of the Petition of

PUGET SOUND ENERGY,

For an Accounting Order Authorizing Puget
Sound Energy's Accounting Treatment for the
Cost Recovery and Pass Back of Natural Gas
Costs and Proceeds Associated with the Climate
Commitment Act in RCW 70A.65

DOCKETS UG-230470 and
UG-230471

PROPOSED BUDGET AND
REQUEST FOR PAYMENT
OF FUND GRANT OF THE
ENERGY PROJECT

- 1 Pursuant to the Washington Extended Interim Participatory Funding Agreement (Funding Agreement),¹ approved by the Washington Utilities and Transportation Commission (Commission) in Docket No. U-210595, The Energy Project (TEP) hereby submits this proposed budget and request for payment of a Fund Grant from the Customer Representation Sub-Fund for Puget Sound Energy (PSE)² in the amount of \$10,000 to partially offset the costs of its participation in these proceedings.
- 2 Since February 2021, TEP has participated in multiple meetings with PSE and interested parties concerning the proposals of PSE and other parties on Climate Commitment Act implementation.³

¹ Docket U-210595, Order 02 Approving Agreement Subject to Condition; Requiring Refiling of Modified Agreement (February 9, 2023).

² See Funding Agreement § 4.2.

³ See Dkt. UG-230470, Order 01 Allowing Tariff Revisions to Become Effective Subject to Conditions, ¶ 2 (Aug. 3, 2023).

3 On June 9, 2023, PSE filed with the Commission a Petition for an Order Approving a Tariff
Revision, in addition to an Order Authorizing Treatment for the Cost Recovery and Pass Back of
Natural Gas Costs and Proceeds Associated with the Climate Commitment Act (CCA). On July
2, 2023 TEP filed written comments in these proceedings, and on July 21, 2023 offered verbal
comments at the Commission’s Open Meeting.

4 On July 24, 2023, TEP filed a Request for Case Certification and Notice of Intent (“NOI”) to
Request a Fund Grant. The Commission has not yet acted on TEP’s NOI.

5 On August 3, 2023 the Commission issued Order 01 in Docket UG-230470, allowing PSE’s
tariff to become effective subject to conditions. On August 10, 2023 the Commission issued
Order 01 in Docket UG-230471, granting PSE’s accounting petition.

I. Proposed Budget

6 Statement of Work for Which Funding is Sought. The Energy Project’s Fund Grant would
partially offset the expense of attorney services to respond to PSE’s proposed tariff revision and
petition concerning Climate Commitment Act costs, revenues, and customer credits.

7 General Areas to be Investigated. TEP is investigating the impacts of PSE’s proposed tariff and
accounting petition on low-income, energy burdened, and vulnerable customers. TEP focuses on
the identification of eligible low-income customers to ensure PSE complies with its obligation to
provide credits to low-income customers sufficient to offset any rate increase caused by PSE’s
compliance with the CCA, and the sharing of risks between customers and PSE’s shareholders.

8 Specific Fund/Available Funds. TEP requests a Fund Grant from the 2023 Customer
Representation Sub-Fund of the Customer Access Fund for PSE.⁴ Section 4.2 of the Funding
Agreement provides a Customer Representation Sub-Fund of \$200,000 for all parties for all PSE
proceedings in 2023. TEP understands that Participating Organizations submitted Proposed

⁴ See Funding Agreements § 4.2.

Budgets for PSE’s 2023 Customer Representation Sub-Fund in docket UG-230393 (Tacoma LNG, Alliance of Western Energy Consumers proposed \$20,000), UE-220066/UG-220067 (2022 General Rate Case Phase 2, Alliance of Western Energy Consumers proposed \$10,000 and TEP proposed \$30,000), and UG-230470-71 (Climate Commitment Act, TEP proposed \$10,000). Based on this information, it appears to TEP that proposed budgets sum to \$70,000, which means that an additional \$130,000 remains available in PSE’s 2023 Customer Representation Sub-Fund. However, TEP does not participate in every docket before the Commission and may not have complete information. TEP is coordinating its request with the other case-certified parties as required under section 6.6 of the Funding Agreement.

9 Proposed Budget. As reflected in Exhibit A, TEP submits a budget for its requested Fund Grant of \$10,000. These amounts represent partial reimbursement of expense. TEP’s total attorney fees for these matters exceed the amount stated; in addition TEP is not requesting reimbursement of wages for in-house staff or other expenses.

II. Request for Payment

10 TEP respectfully submits that this request for payment satisfies the requirement of the Funding Agreement Section 7.1 as follows:

- a. 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 B. TEP’s total attorney fees for these matters exceeds the amount stated; in addition TEP is not requesting reimbursement of wages for in-house staff or other expenses.
- b. Section 7.1(b). TEP was a full and active participant in these dockets and the expenses are reasonable and directly attributable to issues and positions pursued on behalf of low-income customers and vulnerable populations, including detailed review of PSE’s

proposed tariff revisions and accounting order, and efforts to develop methods for automatically identifying low-income customers to widen the scope of low-income customers who receive a credit to offset any rate increase caused by PSE's CCA compliance. TEP was the only party focusing solely on the interests of low-income customers in this proceeding. The expenses included in Confidential Attachment A are Eligible Expenses as defined in Funding Agreement Section 7.3 and are reasonable and directly attributable to TEP's participation in this proceeding on behalf of low-income customers and vulnerable populations.

- c. Section 7.1(c). As set forth in this request for payment, TEP has provided information sufficient to demonstrate that TEP complied with all conditions and requirements placed on it.
- d. Section 7.1(d). This request is a final request for payment under the Approved Fund Grant for the full amount of the Approved Fund Grant.
- e. Section 7.3. All of the expenses included in Confidential Attachment A are Eligible Expenses as defined in Section 7.3 of the Funding Agreement.

11 Upon approval of this request for payment by the Commission, please send payment to TEP as follows:

The Energy Project
Washington State Community Action Partnership
PO Box 7130, Olympia, WA 98507

III. Conclusion

12 For the foregoing reasons, TEP respectfully requests that the Commission accept its Proposed Budget. Further, TEP has satisfied the terms of the Funding Agreement and respectfully requests

that the Commission approve payment of TEP's Fund Grant in the amount of \$10,000 from the PSE Customer Representation Sub-Fund.

DATED: October 13, 2023

By:

/s/ Yochanan Zakai

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* Mr. Zakai is not a member of the State Bar of California.

EXHIBIT A

The Energy Project's Calendar Year 2023 Proposed Budget

Personnel	Estimate of Hours	Rate	Cost
<i>Attorney Fees</i> ⁵			
Attorney	55	\$230-\$330	\$10,000
Total Request			\$10,000

⁵ Attorney fees do not represent Shute, Mihaly, and Weinberger LLP's market rates. In support of The Energy Project's representation of vulnerable populations and low-income customers, and the firm's commitment to equity, Shute, Mihaly, and Weinberger LLP represents The Energy Project at discounted rates.