

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067
(Consolidated)

THE ENERGY PROJECT NOTICE OF
INTENT TO REQUEST A FUND
GRANT AND PROPOSED BUDGET

1 Pursuant to RCW 80.28.430, and the Washington Extended Interim Participatory Funding Agreement (Funding Agreement) approved by the Washington Utilities and Transportation Commission (Commission),¹ The Energy Project (TEP) hereby submits this Notice of Intent to Request a Fund Grant and Proposed Budget.

2 In Order 08, the Commission granted TEP's request for case certification in this proceeding.²

I. Notice of Intent to Request Fund Grant

3 Pursuant to Section 6.2 of the Funding Agreement, TEP provides this Notice of Intent to Request a Fund Grant from the Customer Representation Sub-Fund of the Customer Access Fund for Puget Sound Energy (PSE).³

4 This Notice is filed within the time designated by the Commission for the second phase of this proceeding and has been served on PSE and the parties of record.

II. Proposed Budget

5 Statement of Work for Which Funding is Sought. The Energy Project intends to request a Fund Grant to partially offset the expense of attorney and expert witness services to respond to PSE's

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

² Order 08 Granting Requests for Case Certification (March 24, 2022), ¶ 51.

³ See Funding Agreement § 4.2, 6.3.

petition to change its credit and collection practices. The procedural schedule in this case assumes a fully litigated case, which requires discovery, pre-filed written testimony, settlement conferences, as well as a hearing and any other events the Commission may deem appropriate. As such, TEP's participation will be extensive.

6 General Areas to be Investigated. TEP is investigating or may investigate all of the impacts of changes to PSE's credit and collections practices on low-income, energy burdened, and vulnerable customers. TEP's analysis will focus on the equity and rate impacts of PSE's proposals.

7 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 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.

8 Proposed Budget. As reflected in Exhibit A, TEP submits an estimated budget for its requested Fund Grant of \$30,000. These amounts represent partial reimbursement of expense. TEP projects

⁴ See Funding Agreements § 4.2.

that its total expert witness and attorney fees for this case will exceed the amount stated. In addition, TEP is not requesting reimbursement of wages for in-house staff or other expenses.

III. Conclusion

9 For the foregoing reasons, TEP respectfully requests that the Commission accept this Notice and Proposed Budget.

DATED: October 13, 2023

By: /s/ Yochanan Zakai
Yochanan Zakai, Oregon State Bar No. 130369*
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
(415) 552-7272
yzakai@smwlaw.com

Attorneys for The Energy Project

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

EXHIBIT A

**The Energy Project's Calendar Year 2023 Proposed Budget for
Phase Two of Dockets UE-220066 and UG-220067**

Personnel	Estimate of Hours	Rate	Cost
<i>Attorney Fees⁵</i>			
Attorney	80	\$230-\$330	\$24,000
<i>Expert Consultant/Witness Fees</i>			
Experts	20	\$240-335	\$6,000
Total Request			\$30,000

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.