

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UE- 240004

Docket UG- 240005

**FRONT AND CENTERED AND
NORTHWEST ENERGY COALITION'S
REQUESTS FOR PAYMENT OF FUND
GRANT**

- 1 Pursuant to the Washington Extended Interim Participatory Funding Agreement (Funding Agreement),¹ approved by the Washington Utilities and Transportation Commission (Commission) in Docket U-210595, and Order 06 / 04 Approving Proposed Budgets and Fund Grants in Dockets UE-240004 & UG-240005, Front and Centered (FC) and NW Energy Coalition (NVEC) hereby respectfully request payment totaling \$73,715. In support of this request, FC and NVEC state the following:
- 2 On February 15, 2024, PSE filed with the Commission tariffs to increase rates, triggering a General Rate Case. On March 27, 2024, FC and NVEC timely intervened.
- 3 On March 27, 2024, FC and NVEC filed a Request for Case Certification and Notice of Intent to Request a Fund Grant (Notice and Request). On April 18, 2024, the Commission approved FC and NVEC's request.²
- 4 On May 2, 2024, FC and NVEC filed a Proposed Budget and requested a Fund Grant in this docket in the following amounts: \$109,722 (FC Budget: \$47,516 and NVEC Budget: \$62,206).

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

² Order 04 / 02 Prehearing Conference Order, ¶ 13 (April 18, 2024).

The Commission approved FC and NWEC's Proposed Budget for a Fund Grant in the amount of \$109,722 on May 15, 2024.³

- 5 FC and NWEC focused on all matters related to the financial impact to customers from PSE's proposed rate increase, the environmental impacts of PSE's proposed investments, and the associated costs of continued investment into fossil fuel powered infrastructure, 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.
- 6 FC and NWEC respectfully submit that these requests for payment satisfy 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 are attached as Confidential Attachment A. The expenses fall into two categories: staff time and expert consultant and witness fees.
 - b. Section 7.1(b). FC and NWEC were full and active participants in this docket and the expenses are reasonable and directly attributable to issues and positions pursued on behalf of customers including expert witness testimonies addressing the impacts of PSE's proposed investments on customers and the environment. FC and NWEC issued and reviewed discovery, participated in settlement conferences, participated in several prehearing/status conferences, prepared and filed outside expert testimony, filed witness testimonies from NWEC and FC staff opposing PSE's proposed rate increase, reviewed testimony of other parties, prepared for and attended an evidentiary hearing, and filed a detailed closing brief. 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 FC and NWEC's participation in this proceeding.

³ Order Approving Proposed Budgets and Fund Grants dated May 15, 2024.

- c. Section 7.1(c). These requests comply with all conditions in Order 06/04. FC and NWECC were represented by pro bono counsel, and partnered with a third organization (Sierra Club) which did not seek grant funding. The requests represent only a modest portion of the Joint Environmental Advocates total expenditures in this matter and are reasonable.
- d. Section 7.1(d). These requests are the final requests for payment under this 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.

7 Upon approval of these requests for payment by the Commission, please send payment to FC and NWECC as follows:

Front and Center
2800 1st Avenue, Suite 201
Seattle, WA 98121

NW Energy Coalition
811 1st Avenue, Suite 305
Seattle, WA 98104

8 FC and NWECC have satisfied the terms of the Funding Agreement and respectfully request that the Commission approve payment of FC and NWECC's Fund Grant in the amount of \$73,715. The FC Expenses of \$38,416 come from the Prioritized Organizations Sub-Fund and the NWECC Expenses \$35,299 come from the PSE Customer Representation Sub-Fund. We respectfully request payment within 30 days of receiving these Requests for Payment as provided in Section 7.6 of the Funding Agreement.

Dated this 9th day of May, 2025.

/s/ Jan E. Hasselman

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