

**EXH. MFT-1T
DOCKETS UE-220066/UG-220067 et al.
2022 PSE GENERAL RATE CASE
WITNESS: MARIEL THURASINGHAM**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UE-220066

Docket UG-220067

In the Matter of the Petition of

PUGET SOUND ENERGY

**For and Order Authorizing Deferred
Accounting Treatment for Puget Sound
Energy's Share of Costs Associated
with the Tacoma LNG Facility**

Docket UG-210918

RESPONSE TESTIMONY OF

MARIEL THURASINGHAM

**ON BEHALF OF
NW ENERGY COALITION, FRONT AND CENTERED, AND SIERRA CLUB**

December 8, 2023

CONTENTS

I.	INTRODUCTION	1
II.	PARTICIPATION IN GRC	3
III.	CONCLUSION	6

LIST OF EXHIBITS

Exh. MFT-2 Professional Qualifications of Mariel Thuraisingham

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 **A.** My name is Mariel Thuraisingham, and I am the Clean Energy Policy Lead at
4 Front and Centered, located at 1501 East Madison Street, Suite 250, Seattle, WA
5 98122.

6 **Q. Please describe your background and experience.**

7 **A.** In my role as the Clean Energy Policy Lead with Front and Centered I support our
8 coalition’s mission to center the interests of BIPOC, frontline and low income
9 communities in environmental and climate policy. My work focuses on legislation,
10 regulatory oversight of utilities and energy system management advances a just and
11 equitable transition to clean and affordable energy for all in Washington.

12 I have appeared before the Washington Utilities and Transportation
13 Commission (the “UTC” or the “Commission”) to advocate for equity in
14 rulemakings and other orders directing energy utilities in matters that impact the
15 well-being of customers and communities largely underrepresented in decision-
16 making.

17 On behalf of Front and Centered I joined Puget Sound Energy’s (“PSE”)
18 General Rate Case (UE – 220066) as a party. I have also previously submitted
19 witness testimony in the adjudication of PSE’s Clean Energy Implementation Plan.
20 Every appearance and submission I have made in this regulatory forum is informed
21 by the knowledge and experience of community leaders in our coalition. I am
22 therefore qualified to speak to the matters raised in this testimony.

23

1 **Q. On whose behalf are you testifying.**

2 **A.** I am testifying on behalf of the Joint Environmental Advocates (JEAs), including
3 the Front and Centered, Sierra Club and NW Energy Coalition.

4 **Q. What is the purpose of your testimony?**

5 **A.** I am testifying here out of concern regarding the change that PSE proposes to the
6 General Rate Case (“GRC”) (UE/G 220066/67) settlement. While the order
7 establishes an \$1,000 arrearage threshold above which they may commence the
8 collections process for customers until the completion of the U-210800 rulemaking
9 (on notice, fees, credit and collections and disconnections), the Company is
10 petitioning to amend that order provision to allow an accelerated and scaled up
11 collections effort by lowering the arrearage threshold and placing more customers
12 into dunning.

13 My testimony offers my perspective on behalf of Front and Centered, as a
14 first-time party in a rate case and coalition of organizations serving communities
15 who are historically disproportionately impacted by structural racism, excluded
16 from governance processes, and underserved by the benefits of a transitioning
17 energy system. The Commission should deny PSE’s request and preserve the
18 integrity of the original order with respect to the nature of this particular provision
19 as a protection for highly impacted and vulnerable customers facing barriers to
20 access to needed energy services.

21 **Q. Please summarize your testimony.**

22 **A.** I am testifying about our frustration that in our first appearance as a party to a rate
23 case, the settlement that was agreed to can be altered in a way that would

1 regressively re-erect barriers to access for customers, particularly low-income
2 residential customers who are not enrolled in and receiving assistance, without a
3 clear pathway to protection for the most vulnerable.

4 **II. Participation in GRC**

5 **Q. What was your experience as a first-time party to a general rate case?**

6 **A.** Front and Centered became a party to the PSE GRC to advocate for PSE to take on
7 greater responsibility for prioritizing and achieving equitable outcomes for
8 customers from the rate increases and programming in the company’s proposal. We
9 were initially hesitant to join as a party because the process appeared intensive and
10 the substance of the case overwhelming. The formal administration of the case—
11 including just the need to request to be a party—are not features designed to make
12 it the experience welcoming to new entrants. It would not be easy, or possible for
13 most, to be a new entrant to a general rate case without significant time, resources,
14 and help—particularly in the form of committed lawyers and a network of
15 informed and experienced advocates willing to offer support, advice, and coalition.

16 Fortunately we had lawyers and a network, in legal representation from the
17 team at Earthjustice as well as partnership with Sierra Club and NW Energy
18 Coalition with whom our values and top priorities in the case were complementary,
19 aligned, or non-competing. We also benefitted from some exchanges with the
20 advocates at The Energy Project and Public Counsel Unit who shared information
21 and expertise on certain issues where our priorities aligned, based on their
22 analytical capabilities and their personal and institutional experience from
23 appearing in decades of interventions in utility rate cases on behalf of consumer

1 and the public interest. We would not have signed on to be a party to the GRC but
2 for the support from this network.

3 Our experience corresponds exactly with what we have seen and heard to be
4 true for the vast majority of organizations in the Front and Centered coalition and
5 their community members—that encouragement from a trusted source for taking
6 on a new challenge is more persuasive than practically any other incentive. For
7 many with limited capacity and concerns about engaging with government
8 institutions, it is an absolute necessity.

9 After becoming a party to the PSE GRC we worked with our lawyers and
10 the other JEA advocates on discussing priority issues and positions, shaping
11 strategy, requesting discovery, organizing evidence, marshalling expertise, crafting
12 testimonies and arguments, and determining our positions for the settlement talks.
13 Being able to work in a team helped to make the entire experience a positive one,
14 and with the finalization of the settlement agreement we stepped back with an eye
15 towards the broad benefits that would result from the order.

16 **Q. How does the Company’s petition to amend concern rate case participants?**

17 **A.** If PSE can successfully petition to amend settlement commitments that it is no
18 longer willing to keep, I will not be able to trust other settlement commitments in
19 the future, and I likely will not be able to justify the extraordinary time, effort, and
20 resources needed for Front and Centered to overcome barriers to participating in
21 future rate cases and other proceedings.

22 While we agreed to the settlement order, we acknowledge that it is not
23 perfect and expect that no party to the agreement would say that their interests are

1 wholly served by it. Yet we trusted that the agreement, with the Commission’s
2 approval, was good enough to compel Washington’s largest utility to take on
3 greater and specific obligations to do work that will advance an equitable clean
4 energy transition and prioritize the distribution of benefits and reduction of burdens
5 for highly impacted communities and vulnerable populations.¹

6 The key issues in the order of interest to us are CETA compliance and clean
7 electricity, electrification, participation, equity metrics and outcome tracking,
8 equitable cost recovery, and affordability and access protections for customers.
9 Amending the order to iron out any kinks, add clarity and structure to the
10 requirements, and achieve agreed upon outcomes in the interest of all parties as
11 well as the public interest and legal mandates is an appropriate use for amendment
12 power. To make it easier for the Company to disconnect power for critical uses
13 (e.g. light, heat, cooking, essential appliances, charging, etc.) without securing
14 ongoing protections for the most vulnerable is not appropriate. That PSE is
15 pursuing this request is concerning to us because it indicates impatience and a lack
16 of faith that are not conducive to equitable action. I view the request as signaling
17 that the Company is largely divesting from the settlement agreement and the
18 resulting Commission order, and it raises doubts about the Company’s commitment

¹ Clean Energy Transformation Act (CETA) RCW 19.405.040 (8): (8) In complying with this section [Greenhouse gas neutrality—Responsibilities for electric utilities—Energy transformation project criteria—Penalties], an electric utility must, consistent with the requirements of RCW [19.280.030](#) and [19.405.140](#), ensure that all customers are benefiting from the transition to clean energy: Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency.

1 and trustworthiness in the 210800 rulemaking and in developing assistance
2 programs intended to serve customers in need.

3 In short, I am concerned that PSE’s request undermines equity and the
4 interests of the most vulnerable and impacted communities in decision-making.
5 Granting it will have a detrimental impact on not only the wellbeing of already
6 vulnerable customers who will experience higher rates of disconnections but also
7 on the imperative to increase and deepen engagement opportunities in regulatory
8 governance by the community leaders who would speak for them.

9 If the Commission grants PSE’s petition, we will be unable to continue to
10 encourage those in our coalition who come from and serve Prioritized
11 Communities to participate in regulatory processes, including future rate cases,
12 with the expectation that the results will reflect a just and equitable institutional
13 imperative.

14 III. CONCLUSION

15 **Q. What are your recommendations?**

16 **A.** The Commission should reject the Company’s petition to amend the order and
17 maintain it as it was agreed to in the settlement process. To the extent that the
18 Commission is inclined to grant the petition at least in part, I support the
19 recommendations offered in the testimony by Witnesses Thompson (NWEC) and
20 Stokes (The Energy Project) to hold the Company accountable to a more equity-
21 centered strategy for transitioning their collections practices.

22 **Q. Does this conclude your testimony?**

23 Yes.