

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

In the Matter of  
  
PUGET SOUND ENERGY, INC.  
  
2021 Clean Energy Implementation Plan

---

DOCKET NO. UE-210795  
  
**FRONT AND CENTERED  
PROPOSED BUDGET**

Pursuant to Orders 04 and 05 issued by the Washington Utilities and Transportation Commission (“Commission”) in Docket U-210595, RCW 80.28.430, and the Washington Interim Participatory Funding Agreement (“Interim Funding Agreement”), Front and Centered hereby submits its Proposed Budget for this matter.

**I. PROPOSED BUDGET**

**A. Statement of Work**

Front and Centered hereby requests a Fund Grant to partially offset the expense of expert consulting services and Front and Centered staff coordination and participation in this proceeding. These expenses include the staff and expert time and other resources that directly inform participation in this docket. Front and Centered is a coalition of over 85 organizations led by and serving communities of color in Washington state, and many of these communities live and work in territory occupied by Puget Sound Energy (“PSE”) services and operations. The wealth of knowledge, experience, and critical perspectives that communities of color contribute to Front and Centered’s engagement in PSE’s CEIP and other regulatory proceedings is not easily reduced to a monetary accounting.

Front and Centered plans to sponsor testimony from multiple expert witnesses, including testimony by a Front and Centered staff witness, by other members of the Front and Centered coalition that provide direct services and community support to PSE customers who constitute

highly impacted communities and vulnerable populations within the meaning of the Clean Energy Transformation Act (“CETA”), and by representatives of historically underrepresented communities that are and directly impacted by this process. Front and Centered’s expert witnesses will address various aspects of PSE’s Clean Energy Implementation Plan (“CEIP”), including but not limited to PSE’s proposed customer benefit indicators (“CBIs”), renewable energy targets, and specific actions; and what is required to give full effect to CETA’s equity mandate.

Due to the significant amount of Front and Centered staff time that has been and will continue to be dedicated to this proceeding, the Fund Grant request does not cover the entire cost of Front and Centered’s participation, but will help offset the costs of outside experts and preparation of Front and Centered’s own testimony.

## **B. General Areas To Be Investigated**

As explained in the Petition to Intervene, Front and Centered is a climate justice coalition of organizations led by and serving communities of color in Washington. Front and Centered’s mission is to advocate for the interests of frontline communities who are first and worst impacted by the climate crisis, particularly low-income and BIPOC communities, in advancing a just and equitable transition from an extractive to a regenerative economy. Front and Centered’s general interests in this case include, but are not limited to:

- 1) Energy equity as a CETA mandate and imperative for a just utility sector
- 2) How to improve PSE’s CBIs, metrics, and baseline for measuring progress in order to better measure equity and assess the distribution of benefits and burdens
- 3) PSE’s specific actions and how to more equitably design solar, energy efficiency, and other distributed energy resource programs

4) The need to apply CBIs to all resource decisions, including utility-scale resources

**C. Specific Fund/Available Funds**

As stated in its Request for Case Certification and Notice of Intent to Request Fund Grant, Front and Centered requests a Fund Grant from the Prioritized Organization Sub-Fund of the Customer Access Fund for Puget Sound Energy. Section 4.2 of the Funding Agreement provides for a Customer Representation Fund of \$200,000 for all parties for all Puget Sound Energy proceedings in 2022. Front and Centered also requested a Fund Grant for participation in the Puget Sound Energy general rate case (Dockets UE-220066 and UG-220067) and may request additional funding under the Funding Agreement in other PSE and all-utility dockets.

**D. Budget**

As reflected in Exhibit A (attached), Front and Centered submits the following estimated budget for its requested Fund Grant:

Estimated Expert Consultants/Witnesses:	\$45,000
Estimated Staff Time:	\$15,000
<b>Total:</b>	<b>\$60,000</b>

These estimates do not include any attorneys’ fees or costs, and several expert consultants and witnesses are being retained at a reduced rate. The Fund Grant request does not reflect the full market value of the services performed by Front and Centered’s experts, and does not cover the entire cost of Front and Centered’s participation in this proceeding.

**E. Prioritized Organization Interest in Areas of Intervention**

PSE’s inaugural CEIP will impact the lives of much of the population of Western Washington in many ways. Front and Centered is a Prioritized Organization and is primarily interested in intervening in this adjudication to examine how PSE’s CEIP will affect highly-

impacted communities and vulnerable populations, including frontline and low income communities of color.

Front and Centered supports the efforts of other Prioritized Organizations involved in this and related proceedings to recover costs, increase the quality of participation, and communicate the opportunities to address a general need for more resources to better represent the interests of overburdened communities in energy regulation.

Dated this 21st day of June, 2022.

Respectfully submitted,

/s/ Amanda Goodin

Amanda Goodin

Molly Tack-Hooper

Earthjustice

810 Third Avenue, Suite 610

Seattle, WA 98104

Ph: (206) 343-7340

agoodin@earthjustice.org

mtackhooper@earthjustice.org

*Attorneys for NW Energy Coalition and  
Front and Centered*