



ATTORNEY GENERAL OF WASHINGTON

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U-210595

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SENT VIA WEB PORTAL

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Re: *Petition for approval of an interim participatory funding agreement pursuant to RCW 80.28.430, Docket U-210595*

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in regard to the Interim Participatory Funding Agreement ("Interim Agreement") filed jointly by Puget Sound Energy, Avista Utilities, PacifiCorp, Cascade Natural Gas Company, Northwest Natural Gas Company, Alliance of Western Energy Consumers, NW Energy Coalition, The Energy Project, Sierra Club, Front & Centered, and Spark Northwest ("Joint Parties"). Public Counsel is not a signatory to the Interim Agreement, but participated in discussions with the Joint Parties to draft the Interim Agreement. Additionally, Public Counsel filed comments in this Docket to provide guidance on the Commission's Policy Statement under which the Interim Agreement was drafted.

Public Counsel is funded through Legislative appropriations as a government entity and, therefore, does not seek additional funding to support participation in proceedings before the Commission. As a general matter, Public Counsel supports efforts to increase participation in Commission proceedings among existing and new parties. Participatory funding as provided in the Interim Agreement is an important way to ensure that a broad array of voices are at the table. Increased participation, especially from organizations representing the interests of marginalized and historically underrepresented communities, enhances the record before the Commission as it contemplates critical policy decisions impacting Washingtonians.

In addition to supporting increased participation in Commission proceedings, Public Counsel is also interested in ensuring that the participatory funding programs are adequately funded and funds are appropriately managed. Participatory funding is ultimately provided through customer rates, so Public Counsel has a vested interest in making sure that funds are managed carefully through a transparent process.

To: Amanda Maxwell, Executive Director and Secretary
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Public Counsel would like to highlight that this is an interim funding plan, and understands that it is the intent of participants to make improvements based on the experience of signatories under the Interim Agreement. As such, it will be critical for the Commission and other stakeholders to evaluate how provisions of the agreement perform over the interim period and ensure it is improved to best suit the needs of participants while balancing the impacts on ratepayers as a whole. The evaluation should include, but is not limited to, the adequacy of funds, appropriation of funds to increase equity in Commission proceedings and decision-making, and whether participation in Commission proceedings has increased in terms of the number of organizations involved and the depth of engagement among Parties.

For this Interim Agreement to be successful, the Commission should conduct broad outreach. Community outreach will ensure that potentially interested organizations are aware that funding is available. The Commission should also provide technical assistance and guidance to these organizations as they apply for funding.

Public Counsel appreciates the opportunity to comment on the Interim Agreement and will be present for comment at the February 24, 2022, Open Meeting. Questions can be directed to Nina Suetake (Nina.Suetake@ATG.WA.GOV or 206-389-2055), Lisa Gafken (Lisa.Gakfen@ATG.WA.GOV or 206-464-6595), or Corey Dahl (Corey.Dahl@ATG.WA.GOV or 206-464-6380).

Sincerely,

/s/ 

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NMS/CJD/BCH