

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP, d/b/a PACIFIC POWER &
LIGHT COMPANY,

Respondent.

DOCKET NO. UE-220376

**NW ENERGY COALITION PETITION TO
INTERVENE**

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, the NW Energy Coalition (“NVEC”) hereby petitions the Washington Utilities and Transportation Commission (the “Commission”) to intervene in the above-captioned proceeding with full party status as described in WAC § 480-07-340. As required in WAC § 480-07-355, NVEC states as follows:

2. The name and address of NVEC are:

Lauren McCloy
NW Energy Coalition
811 First Avenue, Suite 305
Seattle, WA 98104
lauren@nwenergy.org

3. NVEC will be represented in this proceeding by Lauren McCloy, Policy Director for NVEC. Ms. McCloy is a full-time employee of NVEC, and is petitioning to represent NVEC pursuant to the qualifications allowed in WAC 480-07-345(1)(c). All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Lauren McCloy
NW Energy Coalition
811 First Avenue, Suite 305
Seattle, WA 98104
lauren@nwenergy.org

4. NWEC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NWEC's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. NWEC provides technical and policy leadership on energy issues in this region, and seeks to promote the development of renewable energy, energy conservation, and affordable energy services. Due to its historic and ongoing work with utility companies and others to achieve these goals, NWEC possesses a substantial interest in the outcome of this proceeding.

5. NWEC has a special interest in this proceeding for the following reasons, including but not limited to: 1) members of NWEC have a direct and substantial interest in PacifiCorp's plan to transition to a clean and equitable energy future; 2) the outcome of this proceeding will impact PacifiCorp's compliance with the Clean Energy Transformation Act ("CETA"); 3) PacifiCorp's application of the Social Cost of Greenhouse Gases ("SCGHG") has a meaningful impact on its Clean Energy Implementation Plan ("CEIP"), and its planned resource acquisitions and specific actions; 4) the proposed specific actions could impact issues related to customer-side resources, distribution system investment, energy efficiency assistance, and other affordability issues for low- and moderate-income customers, which are priorities for NWEC.

6. NWEC seeks to intervene in this proceeding regarding the Complaint lodged against PacifiCorp, alleging that the Company failed to incorporate the social cost of greenhouse gases ("SCGHG") in the preferred portfolio of its clean energy implementation plan (CEIP), as required by Commission Order 01 in Docket UE-210829, Revised Code of Washington (RCW) 19.280.030(3)(a)(ii), RCW 19.280.030(3)(a)(iii), Washington Administrative Code (WAC) 480-100-640(7), and WAC 480-100-660(4). In this proceeding, the Commission may determine whether PacifiCorp properly utilized the SCGHG in its CEIP preferred portfolio and how the

SCGHG should be incorporated in future CEIPs. NWECC is concerned that PacifiCorp's CEIP has not properly utilized the SCGHG and plans to address that issue in this proceeding.

7. NWECC has extensive experience participating in utility resource planning dockets and, in particular, the application of the SCGHG in Washington, pursuant to CETA. NWECC commented on this issue during the development of PacifiCorp's IRP and CEIP, as well as Puget Sound Energy and Avista's CEIPs. NWECC also commented extensively on this issue during the rulemaking process for RCW 80.28.405. Accordingly, NWECC is able to bring a unique and informed perspective to this docket that may be useful to the Commission.

8. Reason For Late-Filed Petition: Pursuant to WAC 480-07-355(1)(b), NWECC has good cause for filing an untimely Petition to Intervene. NWECC was first made aware of Order 03 Denying Motion to Consolidate this proceeding with Docket No. 210829 and the Notice of Deadline for Petitions to Intervene on Wednesday, August 31st. NWECC staff was not able to review those filings until September 1, 2022. On September 2, 2022, Ms. McCloy experienced a veterinary emergency which required her immediate attention. That incident, combined with the Labor Day Holiday on Monday, September 5th, caused NWECC to file the Petition to Intervene in this docket after the intervention deadline had passed. NWECC has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding. To avoid duplication of efforts, NWECC intends to work with the Sierra Club, who has also petitioned to intervene in this proceeding. NWECC thus respectfully requests that the Commission grant its Petition to Intervene.

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9. For the foregoing reasons, NWECC respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 6th day of September, 2022.

Respectfully submitted,

/s/ Lauren McCloy

Lauren McCloy
Policy Director
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