## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

)	Docket UE-121373: Petition for Approval
)	of a Power Purchase Agreement for
)	Acquisition of Coal Transition Power, as
)	defined in RCW 80.80.010, and the
)	recovery of related acquisition costs
)	
)	
)	
)	NW Energy Coalition's
)	Petition to Intervene
	) ) ) ) ) ) )

The NW Energy Coalition (Coalition) hereby requests permission to intervene in the abovereferenced proceeding. In support thereof, the Coalition asserts the following:

A. The Coalition's business address is:

NW Energy Coalition 811 1<sup>st</sup> Ave., Suite 305 Seattle, WA 98104

B. The Coalition will be represented in this matter by Senior Policy Associate Danielle Dixon and Policy Director Nancy Hirsh. Ms. Dixon is designated for service of all documents in this matter. They have separately filed a notice of appearance with the Commission, as required by WAC 480-07-345(2). They can be reached at 206-621-0094, fax 206-621-0097, emails: danielle@nwenergy.org, nancy@nwenergy.org.

C. The Coalition is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. The Coalition's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. Due to its historic and ongoing work with utility companies and others to achieve these goals, the Coalition possesses a unique interest in the outcome of this proceeding.

D. The Coalition has a special interest in this proceeding. The Coalition was one of the parties that negotiated amendments in 2011 to Washington's emissions performance standard (RCW 80.80) - establishing a path to transition the Centralia coal plant into compliance with that standard for one of its generating boilers by 12/31/2020 and the other by 12/31/2025. PSE's petition comes out of those amendments to the law. In June 2012, the Coalition signed a Memorandum of Understanding with TransAlta, Sierra Club, Washington Environmental Council and Climate Solutions. In that MOU, we agreed to "Mutually support or not oppose, consistent with each group's customary roles and activities, the approval of power sales of coal

transition power by the Washington Utilities and Transportation Commission, or any other appropriate regulatory body <u>if the power sales contract is in the public interest</u>" (emph added). We intend to analyze the power purchase agreement and PSE's supporting testimony to determine if it meets the standard of being in the public interest.

E. The Coalition offers this process considerable expertise in the area of resource planning, industry structure, and economic and policy analysis. The Coalition has participated in numerous rate cases, mergers, and resource planning proceedings in Washington, Oregon, Idaho, and Montana. The Coalition has participated in previous PSE adjudicated proceedings.

F. The Coalition has no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through its intervention.

For the foregoing reasons, the Coalition asks the Commission to grant its Petition to Intervene in this matter.

September 4, 2012

Respectfully submitted,

Danielle Dixon

Danielle Dixon, Senior Policy Associate NW Energy Coalition 811 1<sup>st</sup> Ave., Suite 305 Seattle, WA 98104