

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-170033 and
UG-170034 (*Consolidated*)

SIERRA CLUB
PETITION TO INTERVENE

1. Pursuant to WAC § 480-07-355, Sierra Club hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for leave to intervene in the above-referenced docket, as an intervenor with full party status as described in WAC § 480-07-340.

2. Sierra Club’s business address:

Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612

3. Sierra Club will be represented in this matter by Travis Ritchie (CA Bar No. 258084). Mr. Ritchie is a full time employee of the Sierra Club and is an attorney in good standing and admitted to practice law by the Supreme Court of California. Mr. Ritchie will separately file a notice of appearance with the Commission, as required by WAC 480-07-345(2).

4. Sierra Club requests service of all documents at the following address:

Travis Ritchie
Sierra Club Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612
travis.ritchie@sierraclub.org

5. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of itself and its more than 26,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of Puget Sound Energy (“PSE”). Sierra Club’s Washington members have a direct and substantial interest in this proceeding, including but not limited to the substantial operational and capital expenses at the Colstrip coal plant in Montana and the depreciation schedule for the Colstrip coal plant. PSE spending on its resource portfolio will have health and economic consequences for Sierra Club members who are customers of PSE. These Sierra Club members have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to the electric power generation expenses that PSE has made.
6. Sierra Club intends to examine the issues presented by PSE related to the operational spending, capital expenditures, and proposed changes to the depreciation schedules for Colstrip to ensure that PSE is pursuing a strategy that best meets the environmental, health, and economic needs of its customers.
7. Sierra Club has extensive experience in the environmental benefits, the public health benefits, and the associated utility economics related to the increased use of renewable generation facilities to replace outdated coal-fired and other fossil fuel generation technology. Sierra Club’s Beyond Coal campaign advances the development of energy conservation and renewable energy policies, which eliminate or reduce global climate change emissions, reduce utility bills, and generate renewable energy. Sierra Club’s work includes advocating for the implementation of robust incentive programs that assist its members and utility consumers generally to generate their own renewable energy and increase energy efficiency. The Sierra Club’s work includes intervening in general rate cases across the country, participating in integrated resource planning, participating in efficiency and renewable energy dockets at public utility commissions nationwide, and submitting comments in numerous state and federal agency energy-related proceedings and rulemakings.

8. Sierra Club is still in the process of reviewing the application and has not identified all of the issues it intends to address. At a minimum, Sierra Club intends to address PSE's revenue requirement requests related to spending at the Colstrip plant in Montana, as well as PSE's plan for the future of Colstrip. Sierra Club has specific experience with Colstrip related issues that are presented in this proceeding. Sierra Club extensively participated in PSE's Integrated Resource Planning process related to Colstrip and other matters, and Sierra Club intervened and submitted testimony in PSE's 2012 rate case (UE-111048). Sierra Club reserves the right to address other issues related to its members' interests once it has had an opportunity to fully review PSE's application.
9. Sierra Club does not propose to broaden the issues in this proceeding.

Dated this 30th day of January, 2017.

Respectfully submitted,



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