

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)

NW ENERGY COALITION, RENEWABLE
NORTHWEST, AND NATURAL
RESOURCES DEFENSE COUNCIL'S
PETITION TO INTERVENE

Pursuant to WAC 480-07-355, the NW Energy Coalition (Coalition), Renewable Northwest (RNW), and Natural Resources Defense Council (NRDC) hereby request permission to intervene in the above- referenced proceeding. In support thereof, the Coalition, RNW, and NRDC assert the following:

A. The Coalition's business address is:

NW Energy Coalition
811 First Avenue, Suite 305
Seattle, WA 98104

B. RNW's business address is:

Renewable Northwest
421 SW 6th Ave., Suite 1125
Portland, OR 97204

C. NRDC's business address is:

Natural Resources Defense Council
111 Sutter Street, 21st Floor
San Francisco, CA 94114

D. The Coalition, RNW, and NRDC will be represented in this matter by attorneys

Amanda W. Goodin, Anna M. Sewell, and Kristen L. Boyles, of Earthjustice. Ms. Goodin, Ms. Sewell, and Ms. Boyles are designated for service of all documents in this matter and will accept electronic service only (no hard copies) at the following address:

Earthjustice Northwest Office
705 Second Avenue, Suite 203
Seattle, WA 98104
Telephone: (206) 343-7340
Facsimile: (206) 343-1526
agoodin@earthjustice.org
asewell@earthjustice.org
kboyles@earthjustice.org

Ms. Goodin, Ms. Sewell, and Ms. Boyles are all attorneys of good standing and admitted to practice law in the State of Washington. They have separately filed a notice of appearance with the Commission, as required by WAC 480-07-345(2). Ms. Goodin will be lead counsel for purposes of official service.

Additionally, Joni Bosh and Wendy Gerlitz, with the Coalition, Dina Dubson Kelley and Silvia Tanner, with RNW, and Noah Long and Chuck Magraw, with NRDC, are also designated for service of all documents in this matter and will accept electronic service only (no hard copies) at the following addresses:

NW Energy Coalition
811 First Avenue, Suite 305
Seattle, WA 98104
joni@nwenergy.org
wendy@nwenergy.org

Renewable Northwest
421 SW 6th Avenue, Suite 1125
Portland, OR 97204
dina@renewablenw.org
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Natural Resources Defense Council
501 8th Avenue
Helena, MT 59601

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c.magraw@bresnan.net

E. 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. The Coalition 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, the Coalition possesses a substantial interest in the outcome of this proceeding.

F. RNW is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. RNW advocates for renewable energy expansion before state and regional policymakers, including Bonneville Power Administration and the Northwest Power and Conservation Council, as well as state agencies, regulators, and individual utilities. It works to create and protect markets for renewable energy expansion, facilitate renewable energy growth through transmission and siting policy, and engage and educate policy and regulatory leaders about the benefits of new renewable energy. Due to its historic and ongoing work with utility companies and others working to promote renewable energy, RNW possesses a substantial interest in the outcome of this proceeding.

G. NRDC is a non-profit corporation dedicated to the preservation of the earth's natural resources and the defense of humanity, plants and animals, and the earth's natural systems necessary for life. NRDC seeks to protect people and promote social and economic justice by protecting the planet. NRDC is comprised of over 1.2 million members and e-activists nationwide, including over 18,000 members residing in Washington. NRDC advocates for the adoption of energy and regulatory policy that produces economically efficient, socially

responsible, and environmentally sound outcomes. In particular NRDC has engaged on issues related to the efficient use of energy, low-income energy services, environmentally preferred renewable power generation, rate design, and utility procurement.

H. The Coalition, RNW, and NRDC have a special interest in this proceeding for the following reasons, among others: (1) members of the Coalition, RNW, and NRDC will be affected by rate changes and cost shifting among customer classes that may result from this proceeding; (2) rate design modifications that occur as a result of this proceeding may affect customer investment in energy efficiency and impact low-income customers; (3) PSE proposes changes to a pilot decoupling program which the Coalition and NRDC advocated for and helped implement; and (4) PSE discusses the closure of the Colstrip coal-fired power plant in Montana, including the depreciation schedule for two units of the plant, how to replace units with other sources of energy, and its plan to retire the units, including how clean-up costs will be met. The Coalition, RNW, and NRDC intend to examine these and other issues in this proceeding.

I. The Coalition, RNW, and NRDC offer this process considerable expertise in the areas of resource planning, industry structure, and economic and policy analysis. The Coalition and RNW have participated in numerous rate cases, mergers, and resource planning proceedings in Washington, Oregon, Idaho, and Montana. NRDC frequently participates in state and federal regulatory proceedings that involve the nation's utilities and has offered expert testimony in previous rate cases in Washington and many other states. The Coalition and RNW have participated as intervenors in previous PSE general rate cases, and NRDC has offered expert testimony in previous PSE general rate cases.

J. The Coalition, RNW, and NRDC have no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through their intervention.

For the foregoing reasons, the Coalition, RNW, and NRDC ask the Commission to grant their Petition to Intervene in this matter.

Respectfully submitted this 8th day of February, 2017.



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