

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKETS UE-190334 and  
UG-190335 (*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 attorneys Jessica Yarnall Loarie (CA Bar No. 252282) and Gloria Smith (CA Bar No. 200824). Ms. Yarnall Loarie and Ms. Smith are full time employees of the Sierra Club and are both attorneys in good standing and admitted to practice law by the Supreme Court of California. Ms. Yarnall Loarie and Ms. Smith will separately file notices 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:

Jessica Yarnall Loarie  
Sierra Club Environmental Law Program  
2101 Webster St., Suite 1300  
Oakland, CA 94612  
jessica.yarnall@sierraclub.org

To the extent allowed by Commission rules and the presiding officer, Sierra Club requests that electronic service only be provided to the following:

Gloria Smith  
Managing Attorney  
gloria.smith@sierraclub.org

Ana Boyd  
Legal Assistant  
ana.boyd@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 31,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of Avista. Sierra Club's Washington members have a direct and substantial interest in this proceeding. Sierra Club's members in Washington, including those in Avista's service territory, have for years advocated for a responsible transition away from reliance on the Colstrip coal plant in Montana and for a cleaner and more sustainable energy portfolio.

6. Sierra Club seeks to intervene in this proceeding regarding Avista's expenditures and depreciation related to Colstrip. For instance, Avista has stated in its testimony that it intends to adjust its Colstrip depreciation schedule and knows it now needs comply with the new clean electricity law (SB 5116) which would move up the depreciation schedule to the end of 2025 instead of the end of 2027.<sup>1</sup> Sierra Club wants to ensure this compliance happens and in a fair and equitable way. Sierra Club may also address other issues that arise in this proceeding.

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<sup>1</sup> Direct Testimony of Dennis P. Vermillion, Avista Corporation, at 19, n. 16. And Direct Testimony of Elizabeth M. Andrews, Avista Corporation, at 4, n. 3.

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 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 does not propose to broaden the issues in this proceeding. To the extent other environmental organizations intervene in the proceeding, Sierra Club will work with those organizations to avoid duplication of efforts.

Dated this 21<sup>st</sup> day of May, 2019.

Respectfully submitted,

/s/ Jessica Yarnall Loarie  
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