

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

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

Respondent.

DOCKET UE-230172

PETITION TO INTERVENE OF
SIERRA CLUB

Pursuant to WAC § 480-07-355, Sierra Club petitions the Washington Utilities and Transportation Commission (“WUTC” or the “Commission”) for leave to intervene in the above-captioned docket as an intervenor with fully party status, as described in WAC § 480-07-340. The name and address of the petitioner is:

Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5500

1. Sierra Club is represented in this proceeding by Rose Monahan. All documents relating to these proceedings should be served on Sierra Club at the following addresses:

Rose Monahan
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5704
rose.monahan@sierraclub.org

Leah Bahramipour
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5649
leah.bahramipour@sierraclub.org

Sierra Club does not request paper service, unless required by WUTC rules or law.

2. The administrative rules at issue are WAC § 480-07-340, -355.
3. Sierra Club, founded in 1892, is the nation’s oldest non-profit, grass-roots

environmental organization. The Washington Chapter of the Sierra Club is a non-profit member-supported, public interest organization that promotes conservation of the Washington natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. Sierra Club has more than 27,000 members in the state of Washington. Sierra Club’s more than 720,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. Sierra Club’s most important current priority is to advance smart, clean energy solutions that address the critical problems of global warming, air pollution, and our nation’s dependence on fossil fuels, while reducing costs and alleviating energy burden. Participating in General Rate Case dockets is an integral component of this work.

4. Sierra Club members who are residential electric customers of PacifiCorp’s Washington service territory have a direct and substantial interest in this proceeding because the Company is seeking Commission approval to increase its electric service rates by \$28.6 million (6.6%) for Rate Year 1 and \$27.9 million (6.5%) for Rate Year 2. Moreover, the Company is proposing major modifications to its fuel adjustor mechanism, the power cost adjustment mechanism (“PCAM”). Specifically, the Company proposes eliminating the deadband and asymmetrical sharing bands in the PCAM, which currently provide important ratepayer protections.
5. Sierra Club seeks to intervene in this proceeding to ensure that PacifiCorp’s proposed rates are just and reasonable. The Company’s proposed rate increase and proposed modifications to the PCAM would have a substantial impact on Sierra Club’s members who are also PacifiCorp’s residential ratepayers. Sierra Club petitions to intervene in this proceeding on behalf of itself and its Washington members.
6. Sierra Club has extensive knowledge and expertise in a wide variety of issues related to environmental and energy law. In the last decade, Sierra Club has appeared in countless proceedings before public utility commissions nationwide. Specific to PacifiCorp, Sierra Club has intervened in dockets in Wyoming, Washington, Utah, Oregon, Idaho, and California related to the review and analysis of PacifiCorp’s IRPs, CPCNs, rate cases, fuel dockets, and other matters. The complex and rapidly changing economic conditions

affecting all types of generation impacts the Company's immediate as well as long-term energy decisions. Sierra Club's interests and expertise in this matter will not be adequately represented by any other party to the proceeding. Sierra Club seeks full intervention to help ensure that the Commission and parties have the information and analysis necessary to fully assess the Company's rate requests.

7. Sierra Club's intervention will not unduly burden the issues in this proceeding as Sierra Club does not intend to broaden the scope of the issues presented in the Company's application or which are inherent in this proceeding.
8. Sierra Club's intervention in this proceeding is timely.
9. For the reasons stated above, Sierra Club respectfully requests that the Commission grant this petition to intervene in this proceeding and allow Sierra Club to participate as a party.

Dated: April 18, 2023

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
Telephone: (415) 977-5704
rose.monahan@sierraclub.org