

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of  
  
HYDRO ONE LIMITED (acting through  
its indirect subsidiary, Olympus Equity  
LLC)  
  
and  
  
AVISTA CORPORATION,  
  
for an Order Authorizing Proposed  
Transaction

DOCKET UE-170970

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 33,000 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. The proposed merger between Hydro One and Avista could impact Avista's ongoing rights and obligations related to the Colstrip plant. The proposed merger could also implicate Hydro One and Avista's commitments to moving toward cleaner energy sources that Sierra Club members who are customers of Avista pay for. Sierra Club members therefore have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that could be affected by the proposed merger. Moreover, Sierra Club is uniquely situated to represent the interests of those members and has substantial experience on issues related to clean energy in Washington.

6. Sierra Club intends to examine the environmental and economic concerns raised by the proposed merger between Hydro One and Avista. Sierra Club does not know the full extent of issues it may address in the course of the proceeding. However, Sierra Club intends to at a minimum explore the obligations and liabilities related to Avista's ownership interest in the Colstrip plant in Montana, and to ensure that Hydro One will be adequately positioned to address those obligations in the future.

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 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 12<sup>th</sup> day of October, 2017.

Respectfully submitted,

/s/ Travis Ritchie  
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