

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP D/B/A PACIFIC POWER
& LIGHT COMPANY,

Petition For a Rate Increase Based on a
Modified Commission Basis Report,
Two-Year Rate Plan, and Decoupling
Mechanism.

DOCKET UE-152253

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
85 Second Street, 2nd Floor
San Francisco, CA 94105

3. Sierra Club will be represented in this matter by attorneys Gloria Smith (CA Bar No. 200824) and Travis Ritchie (CA Bar No. 258084). Ms. Smith and Mr. Ritchie 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. Smith and Mr. Ritchie 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 addresses:

Travis Ritchie
Sierra Club Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
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Jeremy Fisher
Synapse Energy Economics
485 Massachusetts Avenue
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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 23,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of PacifiCorp. Sierra Club's Washington members have a direct and substantial interest in this proceeding because substantial capital expenses at the Jim Bridger coal plant in Wyoming and the depreciation schedules for the Jim Bridger and Colstrip coal plants will have health and economic consequences for Sierra Club members who are customers of PacifiCorp. 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 PacifiCorp has made.
6. Sierra Club intends to examine the issues presented by PacifiCorp related to the capital expenditures at Jim Bridger and proposed changes to the depreciation schedules for Jim Bridger and Colstrip to ensure that PacifiCorp 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 also has specific experience with the particular capital expenditures at issue in this proceeding. Sierra Club intervened and submitted detailed testimony before the Utah and Wyoming Public Service Commissions addressing the prudence of PacifiCorp's expenditures to install selective catalytic reduction ("SCR") on Jim Bridger units 3 and 4. Sierra Club determined in those proceedings that PacifiCorp's decision to spend substantial sums on capital additions at Jim Bridger units 3 and 4 was imprudent because lower cost and lower risk alternatives were available to the Company. Sierra Club expects to take a similar position after it has had an opportunity to fully review PacifiCorp's application and conduct discovery.
9. Sierra Club also intends to address PacifiCorp's proposed changes to the depreciation schedules at Jim Bridger and Colstrip, but it has not yet developed a position on this issue.
10. Sierra Club does not propose to broaden the issues in this proceeding.

Dated this 4th day of December, 2015.

Respectfully submitted,



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