

**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

PETITION TO INTERVENE  
OF NORTHWEST ENERGY  
COALITION, RENEWABLE  
NORTHWEST AND THE  
NATURAL RESOURCES DEFENSE  
COUNCIL

1 Pursuant to WAC 480-07-355 (1), Northwest Energy Coalition (NVEC or The  
Coalition), Renewable Northwest (RNW), and the Natural Resources Defense Council (NRDC)  
(collectively the Petitioners) petition the Washington Utilities and Transportation Commission  
(Commission or UTC) for leave to intervene in the above-captioned docket as an intervenor.  
The Petitioners request intervention with full party status as described in WAC 480-07-340.

2 The business addresses and contact information for the Petitioners are as follows:

A. NVEC

Wendy Gerlitz  
Amy Wheelless  
NW Energy Coalition  
811 First Avenue, Suite 305  
Seattle, WA 98104  
[wendy@nwenergy.org](mailto:wendy@nwenergy.org)  
[amy@nwenergy.org](mailto:amy@nwenergy.org)

PETITION TO INTERVENE OF NVEC,  
RNW AND NRDC  
DOCKET UE-170970

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Jeffrey D. Goltz  
Cascadia Law Group  
600 Columbia Street NW  
Suite 212  
Olympia, WA 98501  
(360) 528-3026

B. RNW

Amanda Jahshan  
Silvia Tanner  
Renewable Northwest  
421 SW 6th Ave., Suite 975  
Portland, OR 97204  
[Amanda@renewablenw.org](mailto:Amanda@renewablenw.org)  
[silvia@renewablenw.org](mailto:silvia@renewablenw.org)

C. NRDC

Noah Long  
Chuck Magraw  
501 8<sup>th</sup> Avenue  
Helena, MT 59601  
[nlong@nrdc.org](mailto:nlong@nrdc.org)  
[c.magraw@bresnan.net](mailto:c.magraw@bresnan.net)

3 The Petitioners will be represented in this proceeding by Jeffrey D. Goltz, Cascadia Law Group:

Jeffrey D. Goltz  
Cascadia Law Group  
606 Columbia Street NW  
Suite 212  
Olympia, Washington 98501  
Phone: (360) 528-3026  
Fax: (360) 786-1835  
[jgoltz@cascadia.law.com](mailto:jgoltz@cascadia.law.com)

All documents relating to this proceeding should be served in electronic format only to Jeffrey Goltz, with a copy to Jessie Turner ([jturner@cascadialaw.com](mailto:jturner@cascadialaw.com)) and to the parties at the addresses provided above. No paper copies are necessary.

4 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.

5           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 the 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.

6           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.

7           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 have a direct and substantial interest in Avista's request for authority to enter into the proposed merger transaction; (2) the proposed merger could impact Hydro One's and Avista's performance related to clean energy implementation; (3) the proposed merger could impact issues related to Avista's interest in the Colstrip coal-fired power plant in Montana; and 4) the proposed merger could impact issues related to energy efficiency assistance and other affordability issues for low and moderate income customers. In each of the aforementioned areas the Petitioners intend to focus our participation on examining whether the net-benefits standard has been met. The Coalition, RNW, and NRDC intend to examine these and other issues in this proceeding.

8           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, resource planning, and other similar 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.

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

10 For the foregoing reasons, NWEC, RNW, and the NRDC respectfully petition the  
Commission for leave to intervene in this proceeding.

11 Dated this 17<sup>th</sup> day of October, 2017.



Jeffrey D. Goltz  
Cascadia Law Group

606 Columbia Street NW  
Suite 212  
Olympia, Washington 98501  
Phone: (360) 528-3026  
Fax: (360) 786-1835  
[jgoltz@cascadialaw.com](mailto:jgoltz@cascadialaw.com)

Attorney for NWEC, RNW, and NRDC