

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a
AVISTA UTILITIES,

Respondent.

DOCKETS UE-200900 and
UG-200901 (*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 attorney Jessica Yarnall Loarie (CA Bar No. 252282). Ms. Yarnall Loarie is a full-time employee of the Sierra Club, is an attorney in good standing, and is admitted to practice law by the Supreme Court of California. Ms. Yarnall Loarie 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, preferably by email for the duration of the COVID-19 pandemic:

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 individuals:

Miriam Raffel-Smith
Legal Assistant
miriam.raffel-smith@sierraclub.org

Doug Howell
Senior Campaign Representative
doug.howell@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 32,500 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 advocated for years 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 related to Colstrip. As part of the last GRC Settlement, Avista agreed "not to support capital expenditures beyond routine capital maintenance costs at Colstrip that will extend the plant's operational life beyond December 31, 2025...[and]...all Colstrip capital expenditures after December 31, 2017, will be subject to a prudence determination in future rate proceedings and Avista will provide detailed information, including a complete record of the decision making and a full accounting of the costs

related to those project expenditures on an annual basis.”¹ For instance, Avista has stated in its testimony that it intends to seek recovery for investments in SmartBurn and details spending on a number of Colstrip items that Sierra Club intends to analyze.² Sierra Club may also address other issues that arise in this proceeding.

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. Sierra Club’s work also 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. Sierra Club thus respectfully requests that the Commission grant its Petition to Intervene.

¹ Direct Testimony of Jason Thackston, Avista Corporation, at 44, Docket Nos. UE-200900 and UG-200901 (Oct. 30, 2020) (citing Final Order No. 09, Docket No. UE-190334).

² *Id.* at 55-68.

Dated this 8th day of December, 2020.

Respectfully submitted,

/s/ Jessica Yarnall Loarie

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