

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PUGET SOUND ENERGY

For an Order Authorizing Accounting for
Costs Associated with COVID-19 Public
Health Emergency

DOCKET UE-200780

DOCKET UG-200781

PETITION TO INTERVENE OF
SIERRA CLUB

1. Pursuant to WAC § 480-07-355, Sierra Club hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced dockets as an intervenor with full party status, as described in WAC § 480-07-340.

2. Sierra Club’s business address is:

Sierra Club
Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612

3. Sierra Club will be represented in this matter by Julian Aris (CA Bar No. 319494). Mr. Aris 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. Aris 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:

Julian Aris
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
julian.aris@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

Ruth Sawyer
Beyond Coal Organizer
ruth.sawyer@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 32,000 members who live and purchase utility services in Washington, many of whom are residential customers of Puget Sound Energy (“PSE”). Sierra Club members in Washington, including those in PSE’s service territory, have for years been involved in assuring that utility rates are fair, just, and reasonable.
6. PSE’s September 3, 2020 petition seeks “an Order authorizing the accounting detailed in this Petition related to the Company’s incremental costs and foregone revenue net of offsets [] associated with the COVID-19 public health emergency.” The deferral of such costs for later ratemaking treatment would substantially and directly affect Sierra Club members who purchase electricity and natural gas services from PSE. Sierra Club intends to explore the potential economic and ratepayer impacts of these requested deferrals, as well as other issues that arise in this proceeding.
7. Sierra Club has extensive experience in rate setting and the associated utility economics related to cost recovery for prudent expenditures. Sierra Club’s Beyond Coal Campaign advances the

development of energy conservation and renewable energy policies, which eliminate or reduce greenhouse gas emissions and promote the accessibility and affordability of utility service. Sierra Club's work includes advocating across the country (often before other state public utility commissions¹) for just and equitable responses to the COVID-19 pandemic and its associated costs and burdens.

8. Sierra Club does not propose to broaden the issues in this proceeding. To the extent that other organizations with similar interests intervene in the proceeding, Sierra Club will work with those organizations to avoid duplicative efforts. Sierra Club thus respectfully requests that the Commission grant its petition to intervene.

Dated this 10th day of November, 2020.

Respectfully submitted,



Julian Aris
Associate Attorney
Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
Oakland, CA 94601
(415) 977-5757
julian.aris@sierraclub.org

¹ E.g., California (Rulemaking (R.) 18-03-011), Colorado (Proceeding No. 20M-0267EG), Indiana (Causes No. 45380 & 45377), Iowa (Dockets No. ARU-2020-0123, ARU-2020-0150, ARU-2020-0156, ARU-2020-0222, ARU-2020-0225), Michigan (Case No. U-20373), Minnesota (Docket 20-492), Missouri (Case No. AW-2020-0356), New York (Case No. 20-M-0266), Wisconsin (Docket 5-UI-120).