

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of Petition of Avista Corporation, d/b/a Avista Utilities, For an Order Authorizing the Company to Revise its Electric Book Depreciation Rates and Authorizing Deferred Accounting Treatment for the Difference in Depreciation Expense.

DOCKET UE-180167

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.

6. Avista's petition seeks to maintain depreciation schedules for Colstrip Units 3 and 4 through 2034 and 2036, respectively. Sierra Club notes that the currently applicable depreciation schedule used by Avista for Colstrip Units 3 and 4 is substantially different than the depreciation schedule used by several co-owners of Colstrip Units 3 and 4. Sierra Club intends to explore the basis for this discrepancy and evaluate what actions may be appropriate to address it. 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 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 13th day of April, 2018.

Respectfully submitted,

/s/ Travis Ritchie

Travis Ritchie, CA Bar No. 258084

Staff Attorney

Sierra Club Environmental Law Program

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