

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

NORTHWEST NATURAL GAS COMPANY  
d/b/a NW NATURAL

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

DOCKET UG-200264

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. The business address of Sierra Club is:

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

3. Sierra Club will be represented in this proceeding 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 NW Natural. Sierra Club members in Washington, including those in NW Natural's territory, have for years been involved in assuring that utility rates are fair, just, and reasonable.
6. NW Natural's March 24, 2020 petition seeks an order authorizing the Company to "allow the use of deferred accounting, from the date of this Petition forward, for costs associated with the recent COVID-19 public health emergency." The deferral of such costs for later ratemaking treatment would substantially and directly affect Sierra Club members who purchase natural gas services from NW Natural. Sierra Club intends to explore the potential ratepayer and economic 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

global 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 commissions<sup>1</sup>) 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 10<sup>th</sup> day of November, 2020.

Respectfully submitted,



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<sup>1</sup> 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).