

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of ) DOCKET UE-152253  
)  
)  
PACIFICORP D/B/A PACIFIC POWER & )  
LIGHT COMPANY, ) PETITION TO INTERVENE  
) OF NW ENERGY COALITION  
Petition For a Rate Increase Based on a )  
Modified Commission Basis Report, Two- )  
Year Rate Plan, and Decoupling )  
Mechanism. )

1 Pursuant to WAC § 480-07-355, NW Energy Coalition (“NWEC” or “Coalition”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket, as an intervenor with full party status as described in WAC § 480-07-340. The business address of NWEC is:

NW Energy Coalition  
811 1<sup>st</sup> Avenue, Ste.305  
Seattle, WA 98104

NWEC will be not be represented by council in this proceeding. All documents relating to this proceeding should be served on NWEC’s attorney and the Coalition at the following addresses:

Joni Bosh	Wendy Gerlitz
NW Energy Coalition	NW Energy Coalition
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2 The administrative rules at issue are WAC § 480-07-340, -355.

3 The NW Energy Coalition (“Coalition”) is an alliance of more than 100 environmental, civic, and human services organizations; utilities; businesses; labor unions; and communities of faith in the Pacific Northwest. The Coalition uses the breadth, depth, and

diversity of its membership organizations to provide technical and policy leadership on energy issues in this region, and seeks to promote the development of renewable energy, energy conservation, and affordable energy.

4 NWEC has substantial interests in the specific subject matter of this action. Applicant is an energy and conservation organization primarily devoted to the promotion of renewable energy resources and increases in energy efficiency in the Northwest through measures like building codes, investments in renewable energy through financial incentives and other means, reduced reliance on fossil-fueled generation power plants, restoration of fish and wildlife harmed by the Northwest's hydropower system, increases in energy resource diversity to protect Washington from the effects of drought and climate change, stabilization of consumer energy bills, local economic and job growth, and reductions in greenhouse gas emissions and air pollution.

5 The Coalition has previously intervened in numerous other proceedings on a regular basis before this Commission. In particular, the Coalition has been involved in Pacific Power and Light rate cases and IRP dockets, many workgroups related to Pacific Power and Light's biennial conservation plans and low income energy programs and the merger with Scottish Power.

6 The proposed revenue requirement increase will have an impact on customers, particularly low income customers, the expected useful life of a fossil burning generator, Jim Bridger, potentially delay the transition to clean fuel renewables, and have some impact on the promotion of energy efficiency measures, topics for which the Coalition has unique expertise and knowledge.

7                   The Coalition’s intervention in this proceeding will assist the Commission in  
resolving the issues and will not unreasonably broaden the issues, burden the record, or delay  
this proceeding.

8                   As described above, the Coalition has a direct and substantial interest in this  
proceeding that will not be adequately represented by any other party, and may be affected by  
any Commission determination made in connection with this proceeding. It is in the public  
interest to allow the Coalition to intervene in this proceeding.

9                   WHEREFORE, NW Energy Coalition respectfully petitions the Commission for  
leave to intervene in this proceeding.

Dated this 14<sup>th</sup> day of January, 2016.

Respectfully submitted,

NW Energy Coalition

*/s/ Joni Bosh*

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