

May 3, 2022

Via Electronic Filing

Amanda Maxwell
Executive Director & Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: In the Matter of Puget Sound Energy

2021 Draft Clean Energy Implementation Plan.

UE-210795

Dear Ms. Maxwell:

This cover letter is to notify the Washington Utilities & Transportation Commission that attached to this document is the Petition to Intervene of Renewable Northwest in the above-referenced docket.

Thank you for your assistance, and please do not hesitate to call with any questions.

Sincerely,

/s/ Max Greene

Max Greene
Regulatory & Policy Director
Renewable Northwest
421 SW 6th Ave, Suite 1400
Portland, OR 97204
503-223-4544
max@renewablenw.org

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

PUGET SOUND ENERGY,

2021 Draft Clean Energy Implementation Plan.

DOCKET UE-210795

PETITION TO INTERVENE OF RENEWABLE NORTHWEST

- 1. By this filing, Renewable Northwest ("RNW") petitions the Washington Utilities and Transportation Commission ("UTC" or "Commission") for leave to intervene in the above-captioned proceeding under Washington Administrative Code § 480-07-355. RNW seeks permission to appear as a party under Washington Administrative Code § 480-07-340.
- 2 Contact information for Renewable Northwest is as follows:

Max Greene
Deputy Director
Renewable Northwest
421 SW 6th Ave, Suite 1400
Portland, OR 97204
503-223-4544
max@renewablenw.org

Katie Ware Senior Regulatory & Policy Manager Renewable Northwest 421 SW 6th Ave, Suite 1400 Portland, OR 97204 503-223-4544 katie@renewablenw.org

3. RNW will be represented in this proceeding by its Deputy Director, John Maxwell (Max) Greene, an active member in good standing of the Oregon State Bar, with Oregon Bar Number 182714. RNW also requests permission under WAC 480-07-345(1)(c) to be represented in this proceeding by Katie Ware, an employee of RNW with the title Senior Regulatory and Policy Manager. RNW requests service to Max Greene and Katie Ware at the contact information listed above in paragraph 2.

- 4. RNW is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. RNW advocates for renewable energy expansion before state and regional policymakers, including Bonneville Power Administration and the Northwest Power and Conservation Council, as well as state agencies, regulators, and individual utilities. It works to create and protect markets for renewable energy expansion, facilitate renewable energy growth through transmission and siting policy, and engage and educate policy and regulatory leaders about the benefits of new renewable energy.
- 5. RNW has a direct and substantial interest in this proceeding. RNW has participated in both the Commission's processes to implement the Clean Energy Transformation Act, RCW Ch. 19-405, and Puget Sound Energy's resource planning and procurement efforts that intersect with the Clean Energy Implementation Plan at the center of this docket. RNW raised issues in Puget Sound Energy's 2021 Integrated Resource Plan that carry through to the Clean Energy Implementation Plan and, if not addressed in this docket, may result in a slower transition to clean resources and a decarbonized system, higher costs for Puget Sound Energy's customers, or even investment in new thermal resources that are likely to become stranded assets. The Commission directed Puget Sound Energy to address some of these issues raised by RNW in the company's 2021 All-Source Request for Proposals, but -- as the company has pointed out in its own filings in this docket -- the processes to address that Request for Proposals and this Clean Energy Implementation Plan are closely tied together.

- 6. RNW is a regular participant in regulatory processes in Washington, Oregon, Montana, and Idaho, and offers expertise in implementation of the Clean Energy Transformation Act and the utility planning process. RNW's intervention in this proceeding will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.
- 7. For the reasons set forth above, RNW respectfully requests that the Commission grant this motion for leave to intervene in the above-captioned proceeding.

Respectfully submitted this 3rd day of May, 2022,

/s/ Max Greene

Max Greene, OR State Bar No. 182714 Deputy Director Renewable Northwest 421 SW 6th Ave, Suite 1400 Portland, OR 97204 503-223-4544 max@renewablenw.org

Attorney for Renewable Northwest

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above **Petition to Intervene of Renewable Northwest** on the following parties via electronic mail.

Dated this 3rd day of May, 2022.

/s/ Max Greene

Max Greene

Alliance of Western Energy Consumers:

Brent Coleman Sommer J. Moser Davison Van Cleve, PC 1750 SW Harbor Way STE 450 Portland, OR 97201 blc@dvclaw.com sjm@dvclaw.com

Assistant Attorney General:

Nash Callaghan WUTC, P.O. Box 47250 Olympia, WA 98504 Nash.callaghan@utc.wa.gov

The Energy Project:

Simon J. ffitch 321 High School Rd. NE, STE D3, Box #383 Bainbridge Island, WA 98110 simon@ffitchlaw.com

Northwest Energy Coalition & Front and Centered:

Amanda Goodin
Molly Tack-Hooper
Earthjustice
810 Third Avenue STE 610
Seattle, WA 98104
agoodin@earthjustice.org
mtackhooper@earthjustice.org

Puget Sound Energy:

Jon Piliaris
Puget Sound Energy
P.O. Box 97034 PSE-08N
Bellevue, WA 98009-9734
Jon.piliaris@pse.com

Public Counsel:

Lisa W. Gafken
Ann Paisner
Nina M. Suetake
Washington Attorney General's Office
Public Counsel Unit
800 Fifth Avenue, STE 2000
Seattle, WA 98104-3188
lisa.gafken@atg.wa.gov
ann.paisner@atg.wa.gov
nina.suetake@atg.wa.gov

Courtesy Service:

chanda.mak@atg.wa.gov corey.dahl@atg.wa.gov pccseaef@atg.wa.gov thomas.johnson@atg.wa.gov aaron.tam@atg.wa.gov dsteele@perkinscoie.com jog@dvclaw.com