

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP D/B/A PACIFIC POWER
& LIGHT COMPANY,

Petition For a Rate Increase Based on a
Modified Commission Basis Report,
Two-Year Rate Plan, and Decoupling
Mechanism.

DOCKET UE-152253

Reply to Staff's Opposition to NWECE's
Late-Filed Petition to Intervene

In accordance with the notice of opportunity to reply issued by the Washington Utilities and Transportation Commission ("Commission") on January 22, 2016, Sierra Club hereby submits this reply in the above-captioned proceeding.

Sierra Club supports NW Energy Coalition's ("NWECE") petition to intervene in this docket. NWECE's breadth of knowledge and experience in Washington and the region would be welcome, and its request at the early stages of this proceeding does not prejudice Sierra Club or any other party. Further, Sierra Club disputes Staff's assertion that NWECE's interests related to "the transition to clean fuel renewables and the promotion of energy efficiency measures" will be adequately addressed by Sierra Club.¹

While Sierra Club supports efforts by NWECE and others to transition to clean fuels and to promote energy efficiency, Sierra Club's positions and interests on those matters are distinct from NWECE. Notably, NWECE is made up of numerous organizations, including "environmental, civic, and human services organizations; utilities; businesses; labor unions; and communities of faith."² Sierra Club frequently disagrees with many members of this coalition on policy issues, and those differences often result in varying tactics, legal opinions and policy positions between NWECE and Sierra Club. Sierra Club therefore does not accept the burden implied by Staff that it will adequately represent

¹ Staff's Response to NWECE's Late File Petition to Intervene at p.3.

² NWECE Petition to Intervene at ¶3.

NWEC's interests on any matter in the current proceeding. NWEC keeps its own counsel on such matters and will advocate its own interests.

For the foregoing reasons, Sierra Club recommends that the Commission grant NWEC's petition to intervene rather than rely on Sierra Club or any other party to represent NWEC's interests in this docket.

Dated this 29th day of January, 2016.

Respectfully submitted,



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