

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER  
& LIGHT COMPANY

2021 Clean Energy Implementation Plan

DOCKET UE-210829

**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 attorney Rose Monahan (CA Bar No. 329861). Ms. Monahan is a full-time employee of the Sierra Club, is an attorney in good standing, and is admitted to practice law by the Supreme Court of California. Ms. Monahan 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, preferably by email:

Rose Monahan  
Sierra Club Environmental Law Program  
2101 Webster St., Suite 1300  
Oakland, CA 94612  
rose.monahan@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 individual:

Sierra Club Petition to Intervene

Leah Bahramipour  
Legal Assistant  
leah.bahramipour@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 25,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of PacifiCorp. Sierra Club's Washington members have a direct and substantial interest in this proceeding. Sierra Club's members in Washington, including those in PacifiCorp's service territory, have advocated for years for a responsible transition away from reliance on coal and other fossil fuel resources and for the development of a cleaner and more sustainable energy portfolio.

6. Sierra Club and its members have a substantial interest in PacifiCorp's 2021 Clean Energy Implementation Plan ("CEIP"). In May 2022, Sierra Club submitted comments on the Company's CEIP, raising a number of issues, including inappropriate assumptions regarding coal fuel purchase obligations, inconsistent price assumptions for clean energy, and the Company's proposed customer benefit indicators, among other issues. Each of these issues relates to whether PacifiCorp's CEIP, and its underlying 2021 Integrated Resource Plan that informed the CEIP, comply with the Clean Energy Transformation Act and are in the best interest of ratepayers. Sierra Club further actively participated in conversations with the Company and other parties regarding PacifiCorp's CEIP and possible resolution of parties' issues. Sierra Club seeks intervention in this proceeding to carry forward the issues it raised in comments to this Commission in May 2022 as well as potentially other issues within the scope of the CEIP.

7. Sierra Club has extensive experience in the environmental benefits, public health benefits, and associated utility economics related to the increased use of renewable generation facilities to replace fossil fuel generation technology. Sierra Club's Beyond Coal and Building Electrification campaigns advance 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 intervening in integrated resource plans, and analogous proceedings, as well as general rate cases, fuel dockets, and efficiency and renewable energy dockets at public utility commissions nationwide, and submitting comments in numerous state and federal agency energy-related proceedings and rulemakings. Accordingly, Sierra Club has special expertise that may be of use to the Commission in this proceeding.

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. Sierra Club thus respectfully requests that the Commission grant its Petition to Intervene.

Dated this 28<sup>th</sup> day of April 2023.

Respectfully submitted,

/s/ Rose Monahan

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Staff Attorney  
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*Attorney for Sierra Club*