

# Sanger Law PC

1041 SE 58th Place Portland, OR 97215

tel (503) 756-7533 fax (503) 334-2235 irion@sanger-law.com

---

March 9, 2020

Via E-filing and USPS

Mr. Mark Johnson  
Executive Director  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

Attn: Filing Center

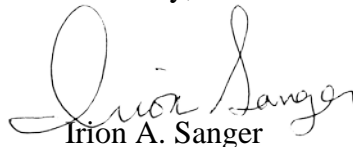
RE: In the Matter of the Application of PUGET SOUND ENERGY, For an Order Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip Unit 4 and Certain of Puget Sound Energy's Interests in the Colstrip Transmission System  
Docket No. UE-200115

Dear Mr. Johnson:

Please find for filing in the above-referenced docket the original and five (5) copies of the Petition to Intervene on behalf of the Renewable Northwest.

Thank you for your assistance. Please do not hesitate to contact me with any questions.

Sincerely,

  
Irion A. Sanger

cc: Service List

Received  
Records Management  
03/09/2020 11:06  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of	)	DOCKETS UE-200115
	)	
PUGET SOUND ENERGY,	)	
	)	PETITION TO INTERVENE OF
For an Order Authorizing the Sale of All	)	THE RENEWABLE NORTHWEST
of Puget Sound Energy's Interests in	)	
Colstrip Unit 4 and Certain of Puget	)	
Sound Energy's Interests in the Colstrip	)	
<u>Transmission System</u>	)	

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, Renewable Northwest (“RNW”) petitions the Washington Utilities and Transportation Commission (the “Commission”) to intervene with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, RNW states as follows:

2. The name and address of RNW is:

Jeff L. Fox  
Renewable Northwest  
615 South Black Ave.  
Bozeman, MT 59715  
Jeff@renewablenw.org

Max Greene  
Renewable Northwest  
421 SW 6th Ave, Suite 975,  
Portland, OR 97204  
Max@renewablenw.org

Katie Ware  
Renewable Northwest  
421 SW 6th Ave, Suite 975,  
Portland, OR 97204  
Katie@renewablenw.org

3. RNW will be represented in this proceeding by Sanger Law, PC. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Jeff L. Fox  
Renewable Northwest  
615 South Black Ave.  
Bozeman, MT 59715  
Jeff@renewablenw.org

Max Greene  
Renewable Northwest  
Max@renewablenw.org

Katie Ware  
Renewable Northwest  
Katie@renewablenw.org

Marie Barlow  
Sanger Law P.C.  
1041 SE 58th Place  
Portland, OR 97215  
marie@sanger-law.com

Irion Sanger  
Sanger Law P.C.  
1041 SE 58th Place  
Portland, OR 97215  
irion@sanger-law.com

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 special interest in this proceeding for the following reasons, including but not limited to: 1) members of RNW have a direct and substantial interest in Puget Sound Energy's proposed sale of Colstrip Unit 4; 2) the proposed sale could impact Puget Sound Energy's performance related to clean energy implementation and decarbonization; 3) the proposed sale could impact the availability of transmission capacity in the region to RNW's members or for other resources; and 4) the proposed sale could impact Puget Sound Energy's energy portfolio. In each of these areas RNW intends to focus its participation on examining whether Puget Sound Energy's filing is fair, just,

reasonable and sufficient, and has not yet taken positions with respect to the matters in controversy. RNW intends to examine these and other issues in this proceeding.

6. RNW offers this process considerable expertise in the areas of resource planning, industry structure, and economic and policy analysis. RNW has participated in numerous rate cases, mergers, resource planning, and other similar proceedings in Washington, Oregon, and Montana.

7. The RNW has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through their intervention.

Dated this 9th day of March 2020.

Respectfully submitted,



Irion Sanger  
Sanger Law P.C.  
1041 SE 58th Place  
Portland, OR 97215  
irion@sanger-law.com  
Telephone: 503-756-7533  
Fax: 503-334-2235

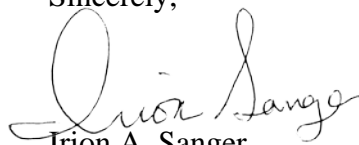
Of Attorneys for Renewable Northwest

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document on behalf of the Renewable Northwest upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, and via electronic mail.

Dated at Portland, Oregon, this 9th day of March 2020.

Sincerely,



Irion A. Sanger

Jon Piliaris  
Puget Sound Energy  
PO BOX 97034 PSE-08N  
Bellevue, WA 98009-9734  
jon.piliaris@pse.com

Joe Dallas  
WUTC  
PO Box 47250  
Olympia, WA 98504  
joe.dallas@utc.wa.gov

David Steele  
Perkins Coie, LLP  
10885 NE Fourth Street STE 4900  
Bellevue, WA 98004  
dsteele@perkinscoie.com

Etta Lockey  
Pacific Power & Light Company  
825 NE Multnomah St. STE 1800  
Portland, OR 97232  
etta.lockey@pacificorp.com

Sheree Strom Carson  
Perkins Coie, LLP  
10885 N.E. Fourth Street STE 700  
Bellevue, WA 98004-5579  
scarson@perkinscoie.com

Patrick Ehrbar  
Director of Regulator Affairs  
Avista Corporation dba Avista Utilities  
PO Box 3727 - MSC-29  
Spokane, WA 99220  
pat.ehrbar@avistacorp.com

Jason Kuzma  
Perkins Coie, LLP  
10885 N.E. Fourth St. STE 700  
Bellevue, WA 98004-5579  
JKuzma@perkinscoie.com

Washington Dockets  
825 NE Multnomah Street STE 2000  
Portland, OR 97232  
washingtondockets@pacificorp.com

Brent Coleman  
Alliance of Western Energy Consumers  
1750 SW Harbor Way STE 450  
Portland, OR 97201  
blc@dvclaw.com

David Meyer  
VP and Chief Counsel  
Avista Corporation dba Avista Utilities  
P.O. Box 3727  
Spokane, WA 99220-3727  
david.meyer@avistacorp.com

Bradley Mullins  
Davison Van Cleve, PC  
1750 SW Harbor Way STE 450  
Portland, OR 97201  
brmullins@mwanalytics.com

Tyler Pepple  
Davison Van Cleve, PC  
1750 SW Harbor Way STE 450  
Portland, OR 97201  
tcp@dvclaw.com

Michael Andrea  
Senior Counsel  
Avista Corporation dba Avista Utilities  
1411 East Mission Ave., MSC-23  
Spokane, WA 99220  
michael.andrea@avistacorp.com

Ajay Kumar  
825 NE Multnomah Street STE 1800  
Portland, OR 97232  
Ajay.Kumar@pacificorp.com

Lisa Gafken  
Office of the Attorney General  
800 Fifth Avenue STE 2000  
Seattle, WA 98104-3188  
Lisa.Gafken@atg.wa.gov

Nina Suetake  
Assistant Attorney General  
Attorney General's Office  
800 5th Avenue STE 2000  
Seattle, WA 98104-3188  
NinaS@atg.wa.gov

Ann Paisner  
800 Fifth Avenue STE 2000  
Seattle, WA 98104-3188  
Ann.Paisner@atg.wa.gov

jog@dvclaw.com;  
Chanda.Mak@atg.wa.gov;  
sarahl2@atg.wa.gov;  
pccseaf@atg.wa.gov;  
kevin.burdet@atg.wa.gov;