

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

Petition to Intervene of the
Natural Resources Defense Council

I. Pursuant to WAC § 480-07-355, the Natural Resources Defense Council ("NRDC") 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.

NRDC maintains several offices in the United States, including one at:

NRDC
111 Sutter St. 21st Floor
San Francisco, CA 94104

II. NRDC will be represented in this proceeding by Kate White Tudor.

All documents relating to this proceeding should be served on NRDC's attorneys and independent consultants at the following addresses:

Kate White Tudor
2417 Capitol Way S.
Olympia, WA 98501
kate@whitetudor.com

Noah Long
NRDC
404 Old Taos Highway
Santa Fe, NM 87501
nlong@nrdc.org

Ralph Cavanagh
NRDC
111 Sutter St. 21st Floor
San Francisco, CA 94104
rcavanagh@nrdc.org

Angus Duncan
1500 SW First Avenue, Suite 885
Portland, OR 97201
aduncan@b-e-f.org

Chuck Magraw
501 8th Ave,
Helena, MT 59601
c.magraw@bresnan.net

NRDC does not request paper service, unless required by WUTC rules or law.

III. Administrative rules at issue are WAC 480-07-340 and WAC 480-07-355.

IV. NRDC is a not-for-profit corporation dedicated to the preservation of the earth's natural resources, including its air, land, and water resources that are impacted by electric power production and delivery. Supported by over 375,000 members across the nation, including over 15,500 Washington State members, NRDC has demonstrated a long-standing interest in protecting Washington State's environmental quality from degradation due to the production, transmission, and distribution of energy.

V. For over three decades NRDC has been actively involved in issues related to utility procurement processes, the efficient use of energy, low-income energy services, and environmentally preferred renewable power generation in the Pacific Northwest. In furtherance of these objectives, over the years NRDC has been a party in numerous formal and informal proceedings before the Commission. NRDC is interested in ensuring that public utility regulation leads to economically efficient, socially responsible, and environmentally sound outcomes.

VI. On February 19, 2020, Puget Sound Energy ("PSE") filed an application that seeks a Commission order authorizing the sale of PSE's interests Colstrip Unit 4 and the Colstrip Transmission System, as well as approval of a power purchase agreement with NorthWestern Energy (the "proceeding"). NRDC'S interest in the proceeding reflects its long-standing engagement on behalf of its members with Washington State's (and other Northwest) utilities on a clean energy transition led by investment in cost-effective energy efficiency and renewable resources, which includes a strong interest in the future of Colstrip Units 3 & 4 (the region's largest single sources of carbon dioxide emissions).

VII. On the matters in controversy, NRDC will focus on ensuring that the PSE proposal improves prospects for the prompt retirement and replacement of one or both of the remaining Colstrip units, which is addressed in PSE's filed testimony. NRDC does not propose to broaden the issues beyond those framed in PSE's testimony.

VIII. As described above, NRDC 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. Thus, it is in the public interest to allow NRDC to intervene in this proceeding.

IX. WHEREFORE, NRDC respectfully petitions the Commission for leave to intervene in this proceeding.

Respectfully submitted this 10th day of March, 2020.

/s/ Katherine (Kate) White Tudor

Katherine (Kate) White Tudor, WSBA # 36870
2417 Capitol Way S.
Olympia WA 98501
Telephone: (360) 402-1272
kate@whitetudor.com
Attorney for the Natural Resources Defense Council