

**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 UE-200115

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 Jessica Yarnall Loarie (CA Bar No. 252282). Ms. Yarnall Loarie is a full time employee of the Sierra Club and is an attorney in good standing and admitted to practice law by the Supreme Court of California. Ms. Yarnall Loarie 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:

Jessica Yarnall Loarie
Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612
Jessica.yarnall@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 individuals:

Andrea Issod
Senior Attorney
andrea.issod@sierraclub.org

Miriam Raffel-Smith
Legal Assistant
miriam.raffel-smith@sierraclub.org

Doug Howell
Senior Campaign Representative
doug.howell@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 31,500 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of Puget Sound Energy. Sierra Club's Washington members have a direct and substantial interest in this proceeding. Sierra Club's members in Washington, including those in Puget Sound's service territory, have for years advocated for a responsible transition away from reliance on the Colstrip coal plant in Montana and for a cleaner and more sustainable energy portfolio.
 6. Puget Sound Energy's petition seeks to authorize the sale of all of their interests in Colstrip Unit 4 and certain interests in the Colstrip Transmission System, and enter into a power purchase agreement with NorthWestern Energy. Sierra Club intends to explore the potential economic, environmental, and ratepayer impacts of this transaction, any impacts on Colstrip transition planning, and evaluate what actions may be appropriate to address any concerns. Sierra Club may also address other issues that arise in this proceeding.
 7. Sierra Club has extensive experience in the environmental benefits, the public health benefits, and the associated utility economics related to the increased use of renewable generation
- Sierra Club Petition to Intervene

facilities to replace outdated coal-fired and other fossil fuel generation technology. Sierra Club's Beyond Coal campaign advances 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 advocating for the implementation of robust incentive programs that assist its members and utility consumers generally to generate their own renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in general rate cases across the country, participating in integrated resource planning, participating in efficiency and renewable energy dockets at public utility commissions nationwide, and submitting comments in numerous state and federal agency energy-related proceedings and rulemakings.

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 10th day of March, 2020.

Respectfully submitted,

/s/ Jessica Yarnall Loarie
Jessica Yarnall Loarie, CA Bar No. 252282
Senior Attorney
Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612
415-977-5636
jessica.yarnall@sierraclub.org