

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

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

Revised Clean Energy Implementation plan.

DOCKET UE-210829

PETITION TO INTERVENE OF  
RENEWABLE NORTHWEST

1. Pursuant to WAC § 480-07-355, Renewable Northwest (“RNW”) petitions the Washington Utilities and Transportation Commission (“UTC” or “Commission”) for leave to intervene in the above-captioned docket as an intervenor with full party status as described in WAC § 480-07-340. The business address of RNW is:

Renewable Northwest  
421 SW 6th Ave, Suite 1400  
Portland, OR 97204-1625

RNW will be represented in in this proceeding by the Western Environmental Law Center, specifically Barbara Chillcott and Melissa Hornbein, legal counsel for RNW. Ms. Chillcott and Ms. Hornbein are authorized to accept service on behalf of RNW and are qualified to appear before the Commission pursuant to WAC § 480-07-345(1)(b), being active members in good standing of the State Bar of Montana. Contact information for Ms. Chillcott and Ms. Hornbein is:

Barbara Chillcott  
Senior Attorney (MT State Bar No. 8078)  
Western Environmental Law Center  
103 Reeder’s Alley  
Helena, MT 59601

Melissa Hornbein  
Senior Attorney (MT State Bar No. 9694)  
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PETITION TO INTERVENE OF  
RENEWABLE NORTHWEST

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John Maxwell (Max) Greene, Deputy Director, is an additional representative of RNW. Mr. Greene is qualified to appear before the Commission pursuant to WAC § 480-07-345(1)(b), being an active member in good standing of the Oregon State Bar, Oregon Bar No. 182714, though is appearing in this docket as an employee representative of RNW pursuant to WAC § 480-07-345(1)(c). Mr. Greene's contact information is:

Max Greene  
Deputy Director  
Renewable Northwest  
421 SW 6th Ave, Suite 1400  
Portland, OR 97204  
503-223-4544  
max@renewablenw.org

RNW requests that all documents relating to this proceeding be electronically served on legal counsel and RNW at their email addresses provided herein.

2. RNW is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. RNW's mission is to decarbonize the Northwest region by accelerating the transition to renewable electricity. In support of its mission, RNW advocates for renewable energy expansion before state and regional policymakers, including the 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 additional renewable energy.

3. RNW has a direct and substantial interest in this proceeding. RNW has participated in both the Commission's processes to implement the Clean Energy Transformation Act, RCW Ch. 19-405, and PacifiCorp's resource planning and procurement efforts that intersect with the Clean Energy Implementation Plan at the center of this docket. RNW previously submitted multiple rounds of public comment in this docket and participated as a non-party in settlement discussions relating to this Biennial Clean Energy Implementation Plan Update and raised issues which, if not addressed in this docket, may result in a slower transition to clean resources and a decarbonized system, higher costs for PacifiCorp's customers, or even investment in new thermal resources that are likely to become stranded assets. RNW has also engaged extensively with PacifiCorp's resource planning process through the Oregon Public Utility Commission, including in dockets LC 70 (2019 IRP), LC 77 (2021 IRP) and LC 82 (2023 IRP).

4. RNW is a regular participant in regulatory processes in Washington, Oregon, Montana, and Idaho, and offers expertise in implementation of the Clean Energy Transformation Act and the utility planning process. RNW's intervention in this proceeding will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

5. For the reasons set forth above, RNW respectfully requests that the Commission grant this petition for leave to intervene in the above-captioned proceeding.

Respectfully submitted this 18th day of April, 2024,

/s/ Barbara Chillcott

Barbara Chillcott

Melissa Hornbein

Western Environmental Law Center

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