

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET UE-210829
)	
Complainant,)	
)	
v.)	PETITION TO INTERVENE OF
)	THE COLUMBIA RIVER INTER-
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY,)	TRIBAL FISH COMMISSION
)	
Respondent.)	
)	

Pursuant to WAC §§ 480-07-355 and 340, the Columbia River Inter-Tribal Fish Commission (“CRITFC”) petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket.

CRITFC is a leading technical assistance agency for natural resources management in the Pacific Northwest and is organized as a political subdivision of the Nez Perce Tribe, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon and Confederated Tribes and Bands of the Yakama Nation. CRITFC’s expertise extends to hydropower operations within the Columbia River Basin and its harmful effects on impacted natural resources and the treaty rights of the Yakama Nation and other member tribes.¹

¹ Treaty with the Yakima Tribe, June 9, 1855, 12 Stat. 951; Treaty with the Tribes of Middle Oregon, June 25, 1855, 12 Stat. 963; Treaty with the Umatilla Tribe, June 9, 1855, 12 Stat. 945; Treaty with the Nez Perce Tribe, June 11, 1855, 12 Stat. 957.

CRITFC's business address is:

Columbia River Inter-Tribal Fish Commission
700 NE Multnomah St., Suite. 1200
Portland, Oregon 97232
Attn: Ms. Christine Golightly

CRITFC will be represented in this proceeding by Christine Golightly and Rob Lothrop, who serve as the organization's Legal Counsel and Policy Director. All documents relating to this proceeding should be served on CRITFC's representatives at the following addresses:

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At issue in this proceeding is PacifiCorp's 2023 Biennial Clean Energy Implementation Plan and its compliance with the Commission's statutory duties to ensure the utility's clean energy targets are both established and reasonably met.² We intend to review PacifiCorp's targets and strategies with our *2022 Energy Vision for the Columbia River Basin (Energy Vision)*³ and the needs of tribal communities in mind. Our conclusions and opinions will be shared with the Commission and parties to this proceeding in the form of comments or written testimony.

Our comments and possible testimony would focus upon the needs of tribal communities, Columbia River salmon, and the fishery interests of the Columbia River treaty tribes as outlined in our *Energy Vision*. As noted therein, our advocacy will prioritize pathways that 1) reduce peak

² See RCW 19.405.060.

load, 2) maximize energy efficiency, 3) strategically site transmission and generation resources to minimize impacts on tribal resources and communities, 4) reduce reliance on federal hydropower operations, and 5) assure the equitable distribution of benefits and burdens.

We welcome the opportunity to participate in this docket and believe our intervention will inform and assist the Commission as it resolves the matters presented and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Importantly, the specific interests of affected tribal communities will not be adequately represented by any other party, and may be affected by the Commission's determinations. Thus, it is in the public interest to allow CRITFC to intervene in this docket.

WHEREFORE, CRITFC respectfully requests the Commission to grant its intervention in this proceeding.

Dated this day of April 18, 2024.

Respectfully submitted,

/s/ Christine Golightly
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³ *Energy Vision for the Columbia River Basin*, Columbia River Inter-Tribal Fish Commission (2022), available at <http://www.critfc.org/energy-vision/>.