

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PACIFIC POWER & LIGHT
COMPANY

For an Order Approving a Change in
Depreciation Rates Applicable to Electric
Property.

DOCKET UE-180778

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 Matthew Gerhart (CO Bar No. 50908) and Marta Darby (CA Bar No. 310690). Mr. Gerhart and Ms. Darby are full-time employees of the Sierra Club and are attorneys in good standing and admitted to practice law by the Supreme Court of Colorado and Supreme Court of California, respectively. Mr. Gerhart and Ms. Darby 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:

Matthew Gerhart
Sierra Club
1536 Wynkoop St., Suite 200
Denver, Colorado 80202
matt.gerhart@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:

Marta Darby
Associate Attorney
marta.darby@sierraclub.org

Ana Boyd
Legal Assistant
ana.boyd@sierraclub.org

5. Sierra Club is a national non-profit environmental and conservation organization incorporated under the laws of the State of California. 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 31,000 members who live and purchase utility services in Washington, many of whom are residential customers of Pacific Power & Light.

6. Sierra Club and its Washington members have a direct and substantial interest in this proceeding. Sierra Club and its Washington members, including those in Pacific Power & Light's service territory, have for years advocated for a responsible transition away from fossil fuel-based generation technology and for a cleaner and more sustainable energy portfolio. Sierra Club members have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to Pacific Power & Light's requested changes to depreciation rates and expenses. These requested changes may ultimately impact their bills and the resource mix that the company uses to generate electricity.

7. The substantial interests of Sierra Club and its members, which may be affected by a Commission determination in this proceeding, will not be adequately represented by any other party. For the reasons herein, Sierra Club's participation also would be in the public interest.

8. Sierra Club intends to examine the issues presented by Pacific Power & Light's requested changes to depreciation schedules and expenses. Sierra Club does not know the full extent of issues it may address in the course of the proceeding. Sierra Club notes that, among other proposals, Pacific Power & Light recommends shortening the depreciation dates of the Colstrip Plant and the Jim Bridger Plant to better align with the depreciation schedules approved in other dockets, including dockets in which Sierra Club actively participated. Sierra Club intends to ensure that the company is pursuing a strategy that best meets the environmental, health, and economic needs of Pacific Power & Light customers and of Sierra Club members. These interests are directly related to the subjects addressed in the company's petition.

9. Sierra Club has extensive experience in the environmental and public health impacts of, and the associated utility economics related to, coal-fired and other fossil fuel generation technology. Sierra Club's work includes intervening in general rate cases and depreciation dockets 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. Sierra Club has participated in various Commission dockets, including Pacific Power & Light proceedings.

10. 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 duplicative filings.

WHEREFORE, Sierra Club respectfully requests leave to intervene in this proceeding to protect its interests and the interests of its members.

Dated this 6th day of November, 2018.

Respectfully submitted,

/s/ Marta Darby

Marta Darby (CA Bar No. 310690)

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