

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP, d/b/a PACIFIC POWER
& LIGHT COMPANY,

Respondent.

DOCKET UE-220376

**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 Street, Suite 1300
Oakland, California 94612
3. Sierra Club will be represented in this matter by attorneys Rose Monahan (CA Bar No. 329861) and Jim Dennison (CO Bar No. 52843). Ms. Monahan is a full-time employee of Sierra Club, is an attorney in good standing, and is admitted to practice law by the Supreme Court of California. Mr. Dennison is also a full-time employee of Sierra Club, is an attorney in good standing, and is admitted to practice law by the Supreme Court of Colorado. Ms. Monahan and Mr. Dennison 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, preferably by email for the duration of the COVID-19 pandemic:

Rose Monahan
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, California 94612
rose.monahan@sierraclub.org

Jim Dennison
Sierra Club Environmental Law Program
1650 38th St. Ste. 102W
Boulder, CO 80301
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To the extent allowed by Commission rules and the presiding officer, Sierra Club requests that electric service only be provided to the following individual:

Maddie Lipscomb
Legal Assistant
maddie.lipscomb@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 25,000 Sierra Club members who live and purchase utility services in Washington, many of whom are residential customers of PacifiCorp. Sierra Club's Washington members have a direct and substantial interest in this proceeding. Sierra Club's members in Washington, including those in PacifiCorp's service territory, have advocated for years for a responsible transition away from reliance on coal and other fossil fuel resources and for the development of a cleaner and more sustainable energy portfolio. As part of this advocacy, Sierra Club has urged fossil fuel owners and operators as well as regulatory bodies to consider the full costs of continuing to burn fossil fuels.

6. Sierra Club seeks to intervene in this proceeding regarding the Complaint lodged against PacifiCorp, alleging that the Company failed to incorporate the social cost of greenhouse gases (SCGHG) in the preferred portfolio of its clean energy implementation plan (CEIP), as required by Commission Order 01 in Docket UE-210829, Revised Code of Washington (RCW) 19.280.030(3)(a)(ii), RCW 19.280.030(3)(a)(iii), Washington Administrative Code (WAC) 480-100-640(7), and WAC 480-100-660(4). In this proceeding, the Commission may determine whether PacifiCorp properly utilized the SCGHG in its CEIP preferred portfolio and how the SCGHG should be incorporated in future CEIPs. Sierra Club is concerned that PacifiCorp's CEIP has not properly utilized the SCGHG and plans to address that issue in this proceeding. Sierra Club may also address appropriate remedy and other issues that arise in this proceeding.

7. Sierra Club has extensive experience participating in utility resource planning dockets and, in particular, PacifiCorp's resource planning, having participated in each of PacifiCorp's integrated resource plan (IRP) processes going back to 2011. Sierra Club has routinely commented extensively on the Company's modeling methodology, including in Sierra Club's comments on PacifiCorp's current CEIP. Sierra Club is also an active participant in PacifiCorp's "Multistate Process," wherein stakeholders across PacifiCorp's six jurisdictions address issues concerning cost allocation and the incorporation of state-specific policy on the Company's system-wide resource planning. Accordingly, Sierra Club is able to bring both a unique and informed perspective that may be useful to the Commission.

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 2nd day of September, 2022.

Respectfully submitted,

/s/ Rose Monahan

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/s/ Jim Dennison

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