

**BEFORE THE PUBLIC UTILITY COMMISSION OF
OREGON**

UM 1790

In the Matter of

PACIFICORP, dba PACIFIC POWER,
2017-2021 Renewable Portfolio Standard
Implementation Plan

PETITION TO INTERVENE

Sierra Club petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Gloria Smith
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: gloria.smith@sierraclub.org
Telephone: 415-977-5532

Please include this contact on the service list.

- 2a. The petitioner will will not be represented by counsel in this proceeding.

- 2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Travis Ritchie
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: travis.ritchie@sierraclub.org
Telephone: 415-977-5727

Name: Alexa Zimbalist
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: alexa.zimbalist@sierraclub.org

Telephone: 415-977-5649

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Sierra Club, founded in 1892, is the nation's oldest non-profit, grass-roots environmental organization. The Oregon Chapter of the Sierra Club is a non-profit member-supported, public interest organization that promotes conservation of the Oregon natural environment by influencing public policy decisions — legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 15,000 members in the state. Sierra Club's 1.3 million members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. The Sierra Club's most important current priority is to advance smart, clean energy solutions that address the critical problems of global warming, air pollution, and our nation's dependence on fossil fuels. Participating in dockets for renewable portfolio standards (RPS) are an integral component of this work.

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Sierra Club has a substantial interest in the company's RPS implementation plan. Its members seek to advance energy development and resource procurement policies in Oregon that recognize the benefits of appropriately-sited, low-emission electricity generating resources for Oregon's economy and the health and well-being of its citizens and natural environment. Sierra Club is concerned that PacifiCorp's decision to largely rely on RECs rather than invest in actual clean energy resources will increase pollution - including emissions of greenhouse gases - into the atmosphere, thus exacerbating the environmental and human health impacts already harming its members' interests. Petitioner's members in Oregon seek to promote clean energy alternatives to fossil fuels, such as wind, solar, and geothermal energy, so as to protect public health and Oregon's unique ecosystems.

5. The issues the Petitioner intends to raise at the proceeding are:

Sierra Club intends to assess Pacificorp's analyses to ensure the company is properly evaluating and valuing potential clean energy builds.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Sierra Club has special expertise in the viability of responsible deployment of clean energy alternatives. With staff and energy experts in PacifiCorp's multi-state territory, Sierra Club can provide knowledge and experience regarding viable renewable energy in PacifiCorp's service territory. Additionally, Sierra Club has experience intervening in similar dockets before the Commission, including PacifiCorp's 2011, 2013 and 2015

Integrated Resource Plan dockets (Dockets No. LC 52, LC 57 and LC 62) and 2012 General Rate Revision docket (Docket No. UE 246).

7. Based on the information provided above in accordance with the Commission's rules of procedure, Sierra Club requests to participate in this proceeding as an intervenor. Given this relatively late filing, Sierra Club confirms it will not broaden the issues, burden the record, or delay the proceeding in any manner in conformance with OAR 860-001-0300.

/s/ Gloria Smith
Petitioner or Petitioner's Representative

August 22, 2016
Date Signed