

**BEFORE THE PUBLIC UTILITY COMMISSION OF
OREGON**

UM 1824

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into PacifiCorp, dba PACIFIC
POWER's Oregon-Specific Cost Allocation
Issues

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: 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

Please include this contact on the service list.

- 2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Joshua Smith
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: joshua.smith@sierraclub.org
Telephone: 415-977-5560

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

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 20,000 members in the state. Sierra Club's 744,000 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 IRP dockets is 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 this docket. 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 has participated extensively in several dockets that address the costs and risks of PacifiCorp's coal fleet. The Commission granted Sierra Club intervention in Docket UM 1050, which led to this docket. Sierra Club is concerned about the effect that the multi-state protocol allocation process will have on PacifiCorp's existing coal plants and upcoming new capital expenditures at those coal plants. Sierra Club therefore seeks to intervene in this proceeding to address issues related to those costs.

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

Sierra Club intends to address costs related to PacifiCorp's coal plants. Sierra Club may also address future issues, to the extent they arise, that address changes or updates to the 2017 protocol.

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 costs and risks of PacifiCorp's coal plants. Sierra Club has experience intervening in similar dockets before the Commission, including PacifiCorp's 2011 and 2013 Integrated Resource Plan dockets (Dockets No. LC 52 and LC 57) and 2012 General Rate Revision docket (Docket No. UE 246)

