

BEFORE THE PUBLIC UTILITY COMMISSION OF

OREGON

LC 74

In the Matter of

IDAHO POWER COMPANY,
2019 Integrated Resource Plan

PETITION TO INTERVENE OF
SIERRA CLUB

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 D. 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: Ana Boyd
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: ana.boyd@sierraclub.org
Telephone: 415-977-5649

Name: Julian Aris
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: julian.aris@sierraclub.org
Telephone: 415-977-5757

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 21,000 members in the state. Sierra Club's nearly 800,000 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 the company's IRP. 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.

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

Sierra Club intends to assess Idaho Power Company's analyses to ensure the company is properly evaluating and valuing the cost of maintaining an aging and dirty coal fleet.

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 Idaho Power Company's territory, Sierra Club can provide knowledge and experience regarding viable renewable energy in Idaho Power Company's service territory. Additionally, Sierra Club has experience intervening in similar dockets before the Commission, including various past Idaho Power Company, PacifiCorp, and Portland General Electric Integrated Resource Plan dockets since 2011 (Dockets No. LC 52, LC 57, LC 62, LC 66, LC 67, LC 68, and LC 70) and PacifiCorp's 2012 General Rate Revision docket (Docket No. UE 246), and UM 1824.

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.

/s/ Gloria D. Smith
Petitioner or Petitioner's Representative

February 18, 2020
Date Signed