BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 77

In the Matter of

PACIFICORP, dba PACIFIC POWER, 2021 Integrated Resource Plan

PETITION TO INTERVENE OF SIERRA CLUB

Pursuant OAR § 860-001-0300(2), the Sierra Club petitions the Public Utility Commission of Oregon ("OPUC" or the "Commission") to intervene in the above-captioned proceeding. In support of this petition, the following is provided:

1. The name and address of the petitioner is:

Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612

2. Sierra Club is represented in this proceeding by Rose Monahan and Gloria D. Smith. All documents relating to this proceeding should be served on Sierra Club at the following addresses:

Rose Monahan Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5704 rose.monahan@sierraclub.org

Ana Boyd Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5649 ana.boyd@sierraclub.org Gloria D. Smith Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5532 gloria.smith@sierraclub.org

3. 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 Sierra Club has more than 23,200 members in the state of Oregon.

Sierra Club's more than 842,000 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.

- 4. Sierra Club has a substantial interest in the company's IRP. Sierra Club has participated in PacifiCorp's IRPs since 2011. 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. Sierra Club intends to assess Pacficorp's analyses to ensure the company is properly evaluating and valuing the cost of maintaining an aging and dirty coal fleet.
- 6. 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, 2015, 2017, and 2019 Integrated Resource Plan dockets (LC 52, LC 57, LC 62, LC 67, LC 70), the 2012 and 2019 General Rate Revision dockets (UE 246, UE 374), and the 2018 and 2021 TAM dockets (UE 323, UE 375).
- 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.

Dated: March 10, 2021

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan Sierra Club 2101 Webster Street, Suite 1300 Oakland, California 94612

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