

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 81**

In the Matter of

AVISTA CORPORATION, dba Avista  
Utilities

2023 Integrated Resource Plan (IRP)

PETITION TO INTERVENE BY  
GREEN ENERGY INSTITUTE AT  
LEWIS & CLARK LAW SCHOOL  
AND CLIMATE SOLUTIONS

The Green Energy Institute at Lewis & Clark Law School and Climate Solutions petition to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioners are:

Name: Carra Sahler  
Company: Green Energy Institute  
Street Address: 10101 S. Terwilliger Blvd  
City, State, Zip: Portland, OR 97219  
Email Address: sahler@lclark.edu  
Telephone: (971) 213-9480

Name: Greer Ryan  
Company: Climate Solutions  
Street Address: 11300 SE Stark St. Suite 207  
City, State, Zip: Portland, OR 97214  
Email Address: greer.ryan@climatesolutions.org  
Telephone: (206) 443-9570

Please include these contacts on the service list.

2. The petitioners  will not be represented by counsel in this proceeding.

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

The Green Energy Institute at Lewis & Clark Law School is a climate and energy policy institute within Lewis & Clark's Environmental, Natural Resources, and Energy Law Program. GEI's mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid.

Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a rapid and equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

4. The nature and extent of the Petitioners' interests in the proceeding is:

Petitioners have substantial interest in the company's IRP. Petitioners are concerned about the investments proposed by Avista that will continue to build out fossil fuel infrastructure during the climate crisis when the State of Oregon is pursuing statutory targets to reduce its carbon emissions and transition away from fossil fuel reliance. Petitioners are concerned that investments in fossil fuel infrastructure will become stranded, leaving environmental justice and low-income communities financially responsible for those assets.

5. The issues the Petitioners intend to raise at the proceeding are:

Petitioners intend to assess Avista's analyses to ensure the company is properly evaluating its investments in a manner that is in the best interest of its customers, the climate, and the state. Petitioners anticipate evaluating Avista's demand forecast; assumptions about price, availability, and regulatory limitations of biomethane, hydrogen, and synthetic methane; consistency with Ashland's Climate Action Plan; and appropriate pathways for compliance with the Climate Protection Program and the need to take near-term emissions reduction actions.

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

The petitioners were involved in LC 79, the docket opened to address NW Natural's 2022 Integrated Resource Plan. The petitioners also participated in the Public Utility Commission's UM 2178 Natural Gas Fact Finding workshops, which involved submitting extensive comments on the regulatory tools presented by staff. Climate Solutions is party to the Avista rate case, in which both petitioners were expert witnesses. The petitioners have raised important climate, equity, and cost considerations in gas rate cases. Petitioners can provide knowledge related to their participation in those proceedings, as well as their expertise described more fully above.

7. Based on the information provided above in accordance with the Commission's rules of procedure, the petitioners request to participate in this proceeding as intervenors. The petitioners will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Carra Sahler  
Green Energy Institute at Lewis & Clark Law School

/s/ Greer Ryan  
Climate Solutions

July 24, 2023  
Date Signed