

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 246**

In the Matter of)	
)	
PACIFICORP)	PETITION TO INTERVENE OF
)	SIERRA CLUB
Request for a General Rate Revision)	
_____)	

Pursuant to ORS § 756.525 and 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 with full party status as described in OAR § 860-001-0010(7).

1. Sierra Club is represented in this proceeding by Gloria D. Smith. All documents relating to these proceedings should be served on Sierra Club at the following addresses:

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PURPOSE OF THE ORGANIZATION

2. 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. The 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.

NATURE AND EXTENT OF PETITIONER’S INTEREST

3. Sierra Club has a substantial interest in this docket. With its General Rate Revision initial filing (“Application”), PacifiCorp d/b/a Pacific Power (“the Company”) seeks to raise electric rates on customers in its service territory, many of whom are Sierra Club members. Beyond economic impacts, Sierra Club members have a distinct interest in the impacts that capital investments made with increased revenue will have on the environment. Specifically, Sierra Club is concerned about significant expenditures on pollution controls at units in the Company’s aging coal fleet. Sierra Club expressed a similar concern in the Company’s Integrated Resource Plan proceeding before the Commission (LC 52), stating that such capital investments may have been premature, and may not have been prudent in the first place nor were they in the best interest of ratepayers. While advanced technologies will reduce emissions of several pollutants from coal-fired generating units, each unit will continue to have a detrimental effect on the environment by emitting greenhouse gases, thereby contributing to global warming. Coal is a dirty, polluting fuel from extraction to combustion. No emission control technology has proven to eliminate emissions of greenhouse gases that stem from burning coal for the generation

of electricity. As the Company mentions installing pollution controls to specific coal-fired units in its Application, Sierra Club has an interest in participating in this docket.

ISSUES PETITIONER INTENDS TO RAISE

4. Sierra Club, on behalf of its members, will request that the Commission fully evaluate the prudence of capital expenditures in coal-fired generating units. The Company's coal fleet is extensive but it has not shown that federally required environmental retrofits that serve to increase the useful lives of these units would, across the board, be in the ratepayers' best interest. Additionally, Sierra Club intends to show that these pollution controls may prove to be inadequate as new Clean Air Act rules become final, necessitating additional expenditures by the Company, which will again be borne by its customers. Future compliance requirements include final EPA rules concerning regional haze, cooling water regulations for existing plants, rules regulating coal combustion waste, and revisions to the National Ambient Air Quality Standards.

SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER

5. Sierra Club has special expertise in the realm of environmental regulatory compliance and the viability of responsible deployment of clean energy alternatives. With staff and volunteers in the Company's multi-state territory, the Sierra Club can provide knowledge and experience about viable energy solutions for clean air and clean water in the region. Additionally, Sierra Club has experience intervening in rate cases, integrated resource planning, and efficiency and renewable energy dockets at public utility commissions nationwide in support of policies and decisions to reduce pollution and promote clean energy alternatives and energy efficiency.

For the foregoing reasons, Sierra Club respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow Sierra Club to participate as a full party with all of the rights afforded thereto.

Dated: March 16, 2012

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 2012, I caused to be served the foregoing PETITION TO INTERVENE OF SIERRA CLUB on all party representatives on the official service list for this proceeding via electronic mail.

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Dated this 16th day of March, 2012 at San Francisco, CA.

/s/

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