

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 375

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

2021 Transition Adjustment Mechanism

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

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 21,400 members in the state. Sierra Club's over 776,000 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.

4. The nature and extent of the Petitioner's interest in the proceeding is:

Sierra Club has a substantial interest in the company's transition adjustment mechanism (TAM). The TAM docket will update PacifiCorp's net power costs for 2021 and will set transition credits for direct access customers. Sierra Club's members seek to advance energy development and resource procurement policies in Oregon that recognize the benefits of appropriately-sited, equitable, low-emission generating resources for Oregon's economy and the health and well-being of its citizens and natural environment. Sierra Club has participated extensively in numerous dockets that address the costs and risks of PacifiCorp's coal plants. PacifiCorp's TAM application includes requests related to the Company's net power costs. PacifiCorp also includes testimony in its filing related to its coal fuel costs and third-party coal suppliers. Sierra Club has substantial experience reviewing and analyzing costs related to PacifiCorp's coal plants.

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

Sierra Club intends to assess PacifiCorp's net power cost calculations and how they relate to coal unit spending and long-term coal contracts. Sierra Club intends to evaluate the fueling strategies for PacifiCorp's coal plants. Sierra Club reserves the right to address other TAM related issues that may arise upon further review of PacifiCorp's application.

6. Petitioner's special knowledge and expertise will 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 2018 TAM docket (Docket No. UE 323), PacifiCorp's 2011, 2013, 2015, 2017 and 2019 Integrated Resource Plan dockets (Dockets No. LC 52, LC 57, LC 62, LC 67, LC 70, LC 74), the 2012 and 2019 General Rate Revision dockets (Docket No. UE 246, UE 374). Sierra Club has also intervened in numerous dockets for other state utility commissions across PacifiCorp's service territory. In particular, Sierra Club filed several rounds of testimony and participated in the evidentiary hearing for PacifiCorp's 2020 ECAC, A.19-08-002 before the California Public Utility Commission. The energy cost adjustment clause (ECAC) docket will adjust rates to recover costs related to the fuel and purchased power costs associated with power generated or procured for the company's customers. Sierra Club will bring its experience and expertise in these recent proceedings to 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.

/s/ Gloria D. Smith

Petitioner or Petitioner's Representative

April 6, 2020

Date Signed