

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 461

In the Matter of)
) PETITION TO INTERVENE BY
) SIERRA CLUB and CLIMATE
AVISTA CORPORATION, dba)
AVISTA UTILITIES,) SOLUTIONS
)
)
Request for a General Rate Revision.)

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Sierra Club and Climate Solutions petition to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information of the petitioners are as follows:

Name: Dylan Plummer
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94703
Email Address: dylan.plummer@sierraclub.org
Telephone: 415-977-5704

Name: Jim Dennison
Company: Sierra Club
Street Address: 1650 38th Street, #102W
City, State, Zip: Boulder, CO 80301
Email Address: jim.dennison@sierraclub.org
Telephone: 435-232-5784

Name: Greer Ryan
Company: Climate Solutions
Street Address: 1402 3rd Ave., Suite 1200
City, State, Zip: Seattle, WA 98101
Email Address: greer.ryan@climatesolutions.org
Telephone: 206-443-9570

2. Petitioners will be represented by Jaimini Parekh and Jan Hasselman from Earthjustice. Their contact information for inclusion in the service list is:

Jaimini Parekh
Senior Attorney, OSB No. 226337
Earthjustice

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810 Third Ave. Suite 610
Seattle, WA 98104
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Jan Hasselman
Senior Attorney, WBSA No. 29107
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Earthjustice
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3. Petitioners also request that Earthjustice's Northwest Regional Office paralegals be included on the service list:

Northwest Regional Office Paralegals
Earthjustice
810 Third Avenue, Suite 610
Seattle, WA 98104
nwparalegals@earthjustice.org

4. Sierra Club, founded in 1892, is the nation's oldest non-profit, grassroots environmental organization. The Oregon Chapter of the Sierra Club and its members promote the conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 19,000 members in the state. Sierra Club's more than 722,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. One of the Sierra Club's priorities is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels.

5. 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.

6. **Interests of the Petitioners in this proceeding:** Sierra Club, and Climate Solutions (collectively “Petitioners”) are committed to advancing their organizational mission and represent the interests of their thousands of members and supporters—many of whom are gas utility ratepayers in the State of Oregon, including in Avista Utilities’ service territory. Petitioners are concerned with the significant proposed rate increases for gas utility customers proposed by Avista Utilities in its application for a general rate revision. Further, Petitioners are concerned with the significant capital expenditures proposed by Avista Utilities that would continue to build out fossil fuel infrastructure during the climate crisis when the State of Oregon is seeking to dramatically reduce its carbon emissions and transition away from reliance on fossil fuels. Petitioners are also concerned that failing to lower energy burdens and mitigate the costs of energy would continue to leave behind environmental justice and low-income communities, and that it would impose increasingly high and significant costs on them to pay for stranded fossil fuel assets.

7. **Issues Raised by Petitioners in this proceeding:** Petitioners will assess the prudence of investments in gas system maintenance and expansion, and its policies related to new gas customer additions—especially in light of climate change, and the need to mitigate for stranded asset risks. Petitioners anticipate evaluating policies and expenditures related to energy burden, energy efficiency, weatherization, bill discount rates, and the affordability of gas utility rates for residential customers. Lastly, Petitioners will review investments into gas related advertising, promotion, and outreach efforts by Avista Utilities, to ensure all charges billed to

ratepayers are appropriate. Petitioners may also address additional issues that arise in the course of this proceeding.

8. Based on the information provided above in accordance with the Commission's rules of procedure, Petitioners request to participate in this proceeding as intervenors. Petitioners' participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

9. WHEREFORE, Petitioners respectfully request leave to intervene, and request all the rights of a party in this proceeding.

Dated this 14th day of April, 2023.

Respectfully submitted,

/s/ Jaimini Parekh

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