



December 4, 2014

**Via Electronic Filing and FedEx**

Public Utility Commission  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem, OR 97308

Re: Docket No. LC 62: Petition to Intervene of Sierra Club

Please find enclosed the original and one (1) copy of the Petition to Intervene of Sierra Club in the above-referenced docket. This document has been e-filed with the Commission and served on parties via email.

Please let me know if you have any questions. Thank you.

Respectfully submitted,

*/s/ Derek Nelson*

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Derek Nelson  
Legal Assistant  
Sierra Club Environmental Law Program  
85 Second St., 2nd Floor  
San Francisco, CA 94105  
(415) 977-5595  
derek.nelson@sierraclub.org

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 62

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2015 Integrated Resource Plan

PETITION TO INTERVENE

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: 85 Second St., 2nd Fl.  
City, State, Zip: San Francisco, CA 94105  
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. The contact information for petitioner's counsel to be included on the service list is:

Name: N/A  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Travis Ritchie  
Company: Sierra Club  
Street Address: 85 Second St., 2nd Fl.  
City, State, Zip: San Francisco, CA 94105  
Email Address: travis.ritchie@sierraclub.org  
Telephone: (415) 977-5727

Name: Derek Nelson  
Company: Sierra Club  
Street Address: 85 Second St., 2nd Fl.  
City, State, Zip: San Francisco, CA 94105  
Email Address: derek.nelson@sierraclub.org  
Telephone: (415) 977-5595

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 15,000 members in the state. 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.

List of Members attached

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

Sierra Club has a substantial interest in this docket. 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. Sierra Club is concerned that aspects of PacifiCorp's Integrated Resource Plan would increase pollution - including emissions of greenhouse gases - into the atmosphere, thus exacerbating the environmental and human health impacts already harming its members' interests. Petitioner's members in Oregon seek to promote clean energy alternatives to fossil fuels, such as wind, solar, and geothermal energy, so as to protect public health and Oregon's unique ecosystems.

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

Sierra Club intends to review PacifiCorp's investments in renewable energy and its fleet of coal-fired power plants.

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

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 PacifiCorp's multi-state territory, Sierra Club can provide knowledge and experience regarding viable energy solutions for clean air and clean water in the region. Additionally, Sierra Club has experience intervening in similar dockets before the Commission, including the PacifiCorp's 2011 and 2013 Integrated Resource Plan dockets (Dockets No. LC 52 and LC 57) and 2012 General Rate Revision docket (Docket No. UE 246).

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

/s/ Gloria D. Smith  
Petitioner or Petitioner's Representative

December 4, 2014  
Date Signed

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of December, 2014, I caused to be served the foregoing PETITION TO INTERVENE OF SIERRA CLUB upon all party representatives on the official service list for this proceeding via electronic mail.

**Dustin T. Till**  
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Dated this 4<sup>th</sup> day of December, 2014 at San Francisco, CA.

*/s/ Derek Nelson*

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