



Western Clean Energy Campaign

April 30, 2015

Via Electronic Filing

Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem, OR 97308
puc.filingcenter@state.or.us

Re: Docket No. LC 62: Western Clean Energy Campaign Petition for Leave to Intervene

Please find enclosed Western Clean Energy Campaign's Petition for Leave to Intervene 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/ Justin Wilson

Justin Wilson
Director
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cc: Service List

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. LC 62

In the Matter of PACIFICORP, dba
PACIFIC POWER, 2015 Integrated
Resource Plan.

PETITION TO INTERVENE

Western Clean Energy Campaign 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: Justin Wilson
Company: Western Clean Energy Campaign
Street Address: 1536 Wynkoop St., Suite 420
City, State, Zip: Denver, CO 80202
Email Address: justin@westernceec.org
Telephone: (720) 446-9232

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:
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:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

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

The Western Clean Energy Campaign is a fiscally sponsored non-profit network of organizations and individuals in the Western US working to promote a transition from reliance on aging coal-burning power toward clean, renewable energy. The Western Clean Energy Campaign works with more than a dozen organizations in the Western United States with an interest in energy resource choices and their impact on the environment.

List of Members attached

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

The Western Clean Energy Campaign has been a participant in Rocky Mountain Power's 2013 and 2015 Integrated Resource Planning processes offering valuable stakeholder feedback related to regulatory requirements for pollution controls and specific modeling scenarios. As an advocate for renewable energy and decreasing pollution from fossil fuel generation, Rocky Mountain Power's 2015 Integrated Resource Plan (IRP) will provide direction to the company for its near- and long-term resource procurement (and retirement) decisions as such Western Clean Energy Campaign has direct interest in Rocky Mountain Power's resource planning and decision-making, and the consequences thereof.

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

The Western Clean Energy Campaign intends to review and comment on PacifiCorp's environmental compliance obligations, investments in pollution controls at various fossil fuel facilities, and use of various models used by PacifiCorp in the 2015 IRP

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

The Western Clean Energy Campaign has expertise in the area of environment compliance for fossil fuel generators and in the use of modeling to support planning decisions. The Western Clean Energy Campaign has been a participant in Rocky Mountain Power's 2013 and 2015 Integrated Resource Planning processes offering valuable stakeholder feedback related to regulatory

requirements for pollution controls and specific modeling scenarios.

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/ Justin Wilson
Petitioner or Petitioner's Representative

April 30, 2015
Date Signed

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2015, I caused to be served the foregoing WESTERN CLEAN ENERGY CAMPAIGN'S PETITION FOR LEAVE TO INTERVEN IN LC 62, PACIFICORP'S 2015 IRP, upon all party representatives on the official service list for this proceeding via electronic mail.

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Dated this 30th day of April, 2015 at Denver, CO.

/s/ Justin Wilson

Justin Wilson

Director

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