

BEFORE THE PUBLIC UTILITY COMMISSION OF
OREGON

LC 66

In the Matter of

PORLAND GENERAL ELECTRIC,
COMPANY

2016 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 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.
The contact information for petitioner's counsel to be included on the service list is:

Name: Joshua Smith
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: joshua.smith@sierraclub.org
Telephone: 415-977-5560

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

Name: Gloria 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

Name: Alexa Zimbalist
Company: Sierra Club
Street Address: 2101 Webster Street, Suite 1300
City, State, Zip: Oakland, CA 94612
Email Address: alexa.zimbalist@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 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. Participating in IRP dockets are an integral component of this work.

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 PGE's Integrated Resource Plan would increase Oregon's reliance on fossil fuel generation thereby increasing air 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 assess PGE's analyses to ensure the company is properly evaluating and valuing potential clean energy builds.

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 viability of responsible deployment of clean energy alternatives. With staff and energy experts in Oregon, Sierra Club can provide knowledge and experience regarding viable renewable energy alternatives to building new natural gas plants. Additionally, Sierra Club has experience intervening in similar dockets before the Commission, including PacifiCorp's 2011, 2013 and 2015 Integrated Resource Plan dockets (Dockets No. LC 52, LC 57 and LC 62) 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, Sierra Club requests to participate in this proceeding as an intervenor. Given this relatively late filing, Sierra Club confirms it will not broaden the issues, burden the record, or delay the proceeding in any manner in conformance with OAR 860-001-0300.

/s/ Gloria Smith

Petitioner or Petitioner's Representative

November 21, 2016

Date Signed