



April 10, 2017

Via Electronic filing

Attn: Docket Office
Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97308-3398

Re: Docket No. LC 67: Petition to Intervene of Sierra Club

Please find enclosed the original copy of the Petition to Intervene of Sierra Club in the above-referenced docket. This document is being served upon all party representatives for this proceeding via electronic filing.

Please do not hesitate to contact me if you have any questions or need other materials. Thank you.

Respectfully submitted,

/s/ Kelly Chang

Kelly Chang
Legal Assistant
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**BEFORE THE PUBLIC UTILITY COMMISSION OF
OREGON**

LC 67

In the Matter of

PACIFICORP, dba PACIFIC POWER,
2017 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: 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: 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 dockets for renewable portfolio standards (RPS) 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 the company's Integrated Resource Plan. Sierra Club has participated in PacifiCorp's IRP's since 2011. 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.

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

Sierra Club intends to assess PacifiCorp's analyses to ensure the company is properly evaluating and valuing the cost of maintaining an aging and dirty coal fleet.

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 PacifiCorp's multi-state territory, Sierra Club can provide knowledge and experience regarding viable renewable energy in PacifiCorp's service territory. 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) and UM 1824.

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

April 10, 2017
Date Signed

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 2017, I caused to be served the foregoing

PETITION TO INTERVENE OF SIERRA CLUB in PACIFICORP, dba PACIFICORP

POWER, 2017 Integrated Resource Plan upon all party representatives on the official service

list for this proceeding via electronic mail.

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Dated this 10th day of April, 2017.

/s/ Kelly Chang

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