

BEFORE THE PUBLIC UTILITY COMMISSION OF

OREGON

UE 374

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Request for a General Rate Revision

PETITION TO INTERVENE OF
SIERRA CLUB

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Sierra Club petitions the Public Utility Commission of Oregon (“OPUC” or the “Commission”) to intervene in the above-captioned proceeding with full party status as described in OAR § 860-001-0010(7).

1. Sierra Club is represented in this proceeding by Gloria D. Smith. All documents relating to these proceedings should be served on Sierra Club at the following addresses:

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PURPOSE OF THE ORGANIZATION

2. 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 21,000 members in the state. Sierra Club’s nearly 800,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. The Sierra Club’s priority 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. Participating in General Rate Case dockets is an integral component of this work.

NATURE AND EXTENT OF PETITIONER’S INTEREST

3. Sierra Club has a substantial interest in this docket. For example, the organization successfully participated in the company’s last general rate case in 2012 (UE 246), and like UE 246 PacifiCorp again seeks to raise electric rates on customers in its service territory, many of whom are Sierra Club members. Beyond economic impacts, Sierra Club members have a distinct interest in the impacts that capital expenditures made with increased revenue will have on our environment. Additionally, Sierra Club is concerned about significant expenditures on pollution controls at units in the Company’s aging coal fleet.

ISSUES PETITIONER INTENDS TO RAISE

4. Sierra Club, on behalf of its members, will request that the Commission fully evaluate the prudence of capital expenditures on coal-fired generating units, and certain wind repowering projects. Also as of this writing, the company is proposing to file a supplemental application addressing a revised depreciation schedule and revised decommissioning study pursuant to the 2020 inter-jurisdictional allocation protocol, of which Sierra Club was a participant.

SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER

5. Over the course of numerous dockets dating back to 2011, Sierra Club has proven its special expertise in the realm of environmental regulatory compliance, resource economics, and the viability of responsible deployment of clean energy alternatives. We intend to bring that unique expertise to bear in UE 374.

For the foregoing reasons, Sierra Club respectfully requests that the Commission grant this petition to intervene, and allow Sierra Club to participate as a full party with all of the rights afforded thereto.

Dated: March 4, 2020

Respectfully submitted,

/s/ Gloria D. Smith
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