



March 18, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

Re: Docket No. UE 400—Sierra Club Motion to Intervene

Please find enclosed the Sierra Club Motion to Intervene in Docket No. UE 400. If you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

Ana Boyd
Research Analyst
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
415-977-5649
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 400

In the Matter of

PACIFICORP, dba PACIFIC POWER,
2023 Transition Adjustment Mechanism

PETITION TO INTERVENE OF
SIERRA CLUB

Pursuant to 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. In support of this petition, the following is provided:

1. The name and address of the petitioner is:

Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5500

2. Sierra Club is represented in this proceeding by Rose Monahan. All documents relating to these proceedings should be served on Sierra Club at the following addresses:

Rose Monahan
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5704
rose.monahan@sierraclub.org

Ana Boyd
Sierra Club
2101 Webster Street, Suite 1300
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3. 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. Sierra Club has more than 21,750 members in the state of Oregon. Sierra Club’s more than 796,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including

protecting public health. 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.

4. Sierra Club has a substantial interest in the Company's transition adjustment mechanism ("TAM"). The TAM docket will update PacifiCorp's net power costs for 2023 and will set transition credits for direct access customers. Sierra Club's members seek to advance energy development and resource procurement policies in Oregon that recognize the benefits of appropriately-sited, equitable, low-emission generating resources for Oregon's economy and the health and well-being of its citizens and natural environment. Sierra Club has participated extensively in numerous dockets that address the costs and risks of PacifiCorp's coal plants. PacifiCorp's TAM application includes requests related to its coal fuel costs and third-party coal suppliers. Sierra Club has substantial experience reviewing and analyzing costs related to PacifiCorp's coal plants.
5. Sierra Club intends to assess PacifiCorp's net power costs calculations and how they relate to coal unit spending and long-term coal contracts. Sierra Club intends to evaluate the fueling strategies for PacifiCorp's coal plants, including the prudence of the forthcoming update to the Long Term Fueling Plan for the company-owned Bridger mine and any new coal supply agreements that PacifiCorp has entered into since the 2022 TAM. Sierra Club reserves the right to address other TAM related issues that may arise upon further review of PacifiCorp's application.
6. Sierra Club has special expertise in the costs and risks of PacifiCorp's coal plants. Sierra Club has experience intervening in similar dockets before the Commission, including PacifiCorp's 2018, 2021 and 2022 TAM dockets (UE 323, UE 375, UE 390), PacifiCorp's 2011, 2013, 2015, 2017, 2019 and 2021 Integrated Resource Plan dockets (LC 52, LC 57, LC 62, LC 67, LC 70, LC 77), and the 2012 and 2019 General Rate Revision dockets (UE 246, UE 374). Sierra Club also has intervened in numerous dockets before other state utility commissions across PacifiCorp's service territory. For example, Sierra Club filed expert testimony and participated in the evidentiary hearing for PacifiCorp's 2020 and 2021 Energy Cost Adjustment Clause ("ECAC") dockets

(A.19-08-002, A.20-08-002), before the California Public Utility Commission.¹ The ECAC dockets adjust rates to recover costs related to the fuel and purchased power costs associated with power generated or procured for the Company's California customers. Sierra Club will bring its experience and expertise in these recent proceedings to UE 400.

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.

Dated: March 18, 2022

Respectfully submitted,

/s/ Rose Monahan
Rose Monahan (*pro hac vice pending*)
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
Telephone: (415) 977-5704
rose.monahan@sierraclub.org

¹ Sierra Club is currently participating in PacifiCorp's 2022 ECAC (A.21-08-004) and submitted intervenor testimony on March 18, 2022.