



**SIERRA  
CLUB**

October 26, 2018

**Via Hand Delivery**

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983  
diane.holt@puc.idaho.gov

**Re: Case No. PAC-E-18-08: Sierra Club Petition to Intervene**

Please find enclosed the Petition to Intervene of Sierra Club in the above mentioned case. This document was hand delivered and served upon all party representatives for this proceeding via e-mail.

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

Sincerely,

*/s/ Ana Boyd*

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Ana Boyd  
Legal Assistant  
Sierra Club Environmental Law Program  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
Phone: (415) 977-5649  
ana.boyd@sierraclub.org

RECEIVED  
2018 OCT 26 PM 2:00  
IDAHO PUBLIC  
UTILITIES COMMISSION

Matthew Gerhart, CO Bar# 50908 (*pro hac vice pending*)  
Sierra Club  
1536 Wynkoop St., Suite 200  
Denver, Colorado 80202  
(510) 847-7721  
matt.gerhart@sierraclub.org

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION )	CASE NO. PAC-E-18-08
OF ROCKY MOUNTAIN POWER FOR )	
AUTHORIZATION TO CHANGE )	PETITION TO INTERVENE OF
DEPRECIATION RATES APPLICABLE TO )	SIERRA CLUB
ELECTRIC PROPERTY )	
)	
)	

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Pursuant to IDAPA 31.01.01.071 *et seq.*, and Order No. 34166 issued in the above-captioned proceeding, Sierra Club hereby submits this petition to intervene on behalf of itself and its Idaho members who are customers of Rocky Mountain Power.

1. The name and address of Sierra Club's national headquarters is:

Sierra Club  
2101 Webster St., Suite 1300  
Oakland, CA 94612  
(510) 847-7721  
matt.gerhart@sierraclub.org

2. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene on behalf of itself and the nearly 3,400 Sierra Club members who live in Idaho, many of whom are residential customers of Rocky Mountain Power.
3. Sierra Club's Idaho members who are customers of Rocky Mountain Power have a direct and substantial interest in this proceeding because the proposed changes to depreciation rates and expenses may ultimately impact their bills. These Sierra Club members have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to the impacts of Rocky Mountain Power's proposed depreciation schedule.

4. Sierra Club's intervention will not unduly broaden the issues or delay the proceeding because Sierra Club's interests are directly related to the subjects addressed in the application, namely, the appropriate depreciation schedules and rates for Rocky Mountain Power. Sierra Club may also address other issues that arise in this proceeding.
5. Sierra Club requests that all future pleadings, correspondence, discovery, and other documents be served on the following:

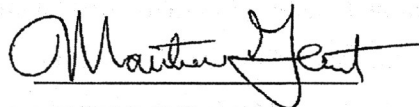
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WHEREFORE, Sierra Club respectfully requests that the Commission issue an order granting Sierra Club permission to appear in this matter.

Dated this 26<sup>th</sup> day of October, 2018.

Respectfully submitted,



Matthew Gerhart  
*Attorney for Sierra Club*

## CERTIFICATE OF SERVICE

I hereby certify that on this 26<sup>th</sup> day of October 2018, I delivered true and correct copies of the foregoing PETITION TO INTERVENE OF SIERRA CLUB to the following persons via the method of service noted:

### Hand Delivery:

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983  
diane.holt@puc.idaho.gov  
(Original and seven copies provided)

### Email:

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