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IDAHO PUBLIC
UTILITIES COMMISSION

Rose Monahan, CA Bar No. 329861 (*pro hac vice* pending)
Sierra Club
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Oakland, California 94612
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Email: rose.monahan@sierraclub.org

Attorney for the Sierra Club

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN
POWER'S FILING FOR
ACKNOWLEDGEMENT OF ITS 2021
INTEGRATED RESOURCE PLAN

CASE NO. PAC-E-21-19

PETITION TO INTERVENE OF
SIERRA CLUB

COMES NOW the Sierra Club and hereby requests leave to intervene on behalf of itself and its Idaho members pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073 and Order No. 35209 issued in the above-captioned matter. As discussed below, Sierra Club has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name and address of Sierra Club's national headquarters is:
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
(415) 977-5704
rose.monahan@sierraclub.org
2. The Sierra Club is a national non-profit environmental and conservation association incorporated under the laws of the State of California. Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of over 4,000 members who live and purchase utility services in

Idaho, many of whom are residential customers of PacifiCorp dba Rocky Mountain Power (“Company” or “RMP”).

3. Sierra Club’s Idaho members have a direct and substantial interest in RMP’s Integrated Resource Plan (“IRP”). Sierra Club has not fully determined the specific positions it will take or the recommendations it may make to the Commission. Sierra Club seeks to intervene for purposes of protecting its interests and the interests of its members, particularly on issues of least-cost, least-risk energy planning and the economic impacts of the Company’s investments in renewable energy and its aging fleet of coal-fired power plants. Sierra Club plans to evaluate RMP’s analyses to ensure that the company is properly valuing the relative costs and benefits of energy resources like coal generation, nuclear, energy efficiency, and renewables. Sierra Club intends to explore these issues and others that may arise in the proceeding.
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 in the Company’s application for approval of its IRP.
5. The interests of both the Sierra Club and its members will not be adequately represented by any other party to this proceeding. To the extent the interests of the Sierra Club overlap with any other party, Sierra Club will coordinate with that party to avoid duplicative efforts.
6. Sierra Club requests that copies all future pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses listed below. In the interest of conserving natural resources and reducing the costs to all parties,

please provide copies of all documents via electronic mail in accordance with IDAPA

Rules 31.01.01.063.02-03.

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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 17th day of November 2021



Rose Monahan
Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November 2021, I delivered true and correct copies of the foregoing **PETITION TO INTERVENE OF SIERRA CLUB** to the following persons via the method of service indicated below:



Ana Boyd
Sierra Club

Electronic mail only (see Order 35058)

Idaho Public Utilities Commission
Jan Noriyuki, Secretary
secretary@puc.idaho.gov

Rocky Mountain Power
Ted Weston
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