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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF AVISTA CORPORATION DBA AVISTA)
UTILITIES FOR AUTHORITY TO)
INCREASE ITS RATES AND CHARGES)
FOR ELECTRIC AND NATURAL GAS)
SERVICE NOTICE OF APPLICATION IN)
IDAHO)

CASE NO. AVU-E-17-01
AVU-G-17-01

PETITION TO INTERVENE OF
SIERRA CLUB

Pursuant to IDAPA 31.01.01.071 *et seq.*, Sierra Club hereby submits this petition to intervene on behalf of itself and its Idaho members who are customers of Avista Utilities (“Avista”).

1. The name and address of Sierra Club is:

Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5727
travis.ritchie@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 over 3,400 Sierra Club members who live and purchase utility services in Idaho, many of whom are residential customers of Avista.
3. Sierra Club’s Idaho members have a direct and substantial interest in this proceeding because Avista’s requested rate increase for 2018 and 2019 will have environmental, health and economic consequences for Sierra Club members who are customers of Avista. 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 Avista’s proposed electric rate increases.

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 Avista's application. Specifically, Sierra Club intends to address the more than \$24 million in capital additions related to the Colstrip coal plant requested by Avista. Sierra Club further intends to evaluate the depreciation expense and schedule applicable to the Colstrip coal plant. While Avista's application does not request a change to depreciation rates at the Colstrip plant, Sierra Club notes, on information and belief, that the currently applicable depreciation schedule used by Avista for Colstrip Units 3 and 4 is substantially different than the depreciation schedule used by several co-owners of Colstrip Units 3 and 4. Sierra Club intends to explore the basis for this discrepancy and evaluate what actions may be appropriate to address it. Sierra Club reserves its rights to address other issues that may arise in the course of this proceeding.
5. Sierra Club requests that all future pleadings, correspondence, discovery, and other documents be served on the following:

Travis Ritchie,
CA Bar# 258084 (*pro hac vice* pending)
Staff Attorney
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 977-5727
travis.ritchie@sierraclub.org

6. Sierra Club is in the process of associating with local counsel and will separately file a motion for Mr. Ritchie to appear *pro hac vice*. Sierra Club requests that the Commission conditionally grant this petition pending Sierra Club compliance with Rule 43.03 and Idaho Bar Commission Rule 227.

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

Dated this 7th day of July, 2017.

Respectfully submitted,



Travis Ritchie
Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July 2017, 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:

FedEx:

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:

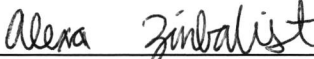
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