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

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IDAHO PUBLIC
UTILITIES COMMISSION

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

	)	
IN THE MATTER OF AVISTA	)	CASE NO. AVU-E-18-03
CORPORATION'S APPLICATION TO	)	AVU-G-18-02
CHANGE ITS ELECTRIC AND NATURAL	)	
GAS DEPRECIATION RATES	)	PETITION TO INTERVENE OF
	)	SIERRA CLUB
	_ )	

Pursuant to IDAPA 31.01.01.071 *et seq.*, and Order No. 34104 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 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 nearly 3,600 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 change to depreciation rates for its electric and natural gas assets will 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 Avista's proposed rates.

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 evaluate and address Avista's estimates for the remaining useful lives of Colstrip Units 3 and 4. Sierra Club notes 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 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:

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

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

Dated this 12<sup>th</sup> day of April, 2018.

Respectfully submitted,

Travis Ritchie

Attorney for Sierra Club

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of April 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:

## 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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Benjamin I. Otto Idaho Conservation League 710 N. 6<sup>th</sup> St. Boise, Idaho 83702 botto@idahoconservation.org

Ana Boyd Legal Assistant

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