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**STATE OF UTAH**  
**Public Service Commission**

In the Matter of PacifiCorp's 2017 Integrated  
Resource Plan

Docket No. 17-035-16

**SIERRA CLUB PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Sierra Club, hereby petitions for leave to intervene in this docket.

In support of this petition, Sierra Club states:

1. Sierra Club petitions to intervene on behalf of itself and its 5,600 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power.
2. The interests of both the Sierra Club and its members will not be adequately represented by any other party to this proceeding.
3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.
4. 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 fleet of coal-fired power plants. Sierra Club is concerned that aspects of RMP's Integrated Resource Plan may not accurately value the relative costs and benefits of energy resources like coal generation, energy efficiency and renewables. Sierra Club intends to explore these issues and others that may arise in the proceeding.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sierra Club to intervene.

6. Notices in this proceeding should be sent to the following:

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7. Gloria D. Smith is an attorney in good standing and licensed to practice law in California (CA Bar No. 200824.) Ms. Smith is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-6(b).

WHEREFORE, Sierra Club requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 29<sup>th</sup> day of September 2017.

Respectfully submitted,

*/s/ Gloria Smith*

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**CERTIFICATE OF SERVICE**

I CERTIFY that on September 29, 2017, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

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Dated this 29<sup>th</sup> day of September, 2017 at Oakland, CA.

/s/ Alexa Zimbalist

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