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STATE OF UTAH
Public Service Commission

In the Matter of PacifiCorp's 2019 Integrated
Resource Plan

Docket No. 19-035-02

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 more than 5,500 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:

Gloria D. Smith
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Julian Aris
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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 R746-1-107.¹

8. Julian Aris is an attorney in good standing and licensed to practice law in California (CA Bar No. 319494.) Mr. Aris is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-1-107.²

¹ Pursuant to Rule R746-1-107, a certificate of good standing for Ms. Smith is attached to this Petition.

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 28th day of January 2020.

Respectfully submitted,

/s/ Julian Aris

Julian Aris
Gloria D. Smith
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² Pursuant to Rule R746-1-107, a certificate of good standing for Mr. Aris is attached to this Petition.



Supreme Court of California

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

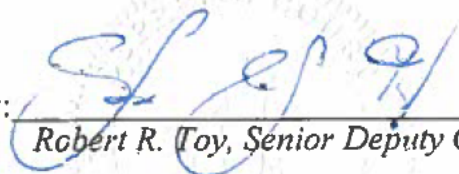
JULIAN DAVID PALACIO

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that **JULIAN DAVID PALACIO, #319494**, was on the **20th day of December, 2017**, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court
on the 12th day of November, 2019.*

JORGE E. NAVARRETE
Clerk/Executive Officer of the Supreme Court

By:


Robert R. Toy, Senior Deputy Clerk



Supreme Court of California

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

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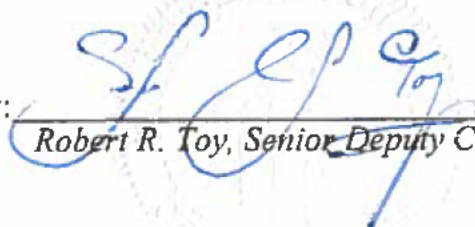
GLORIA DIANTHA SMITH

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that **GLORIA DIANTHA SMITH, #200824**, was on the **2nd day of June, 1999**, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court
on the 12th day of November, 2019.*

JORGE E. NAVARRETE
Clerk/Executive Officer of the Supreme Court

By:


Robert R. Toy, Senior Deputy Clerk

STATE OF UTAH
Public Service Commission

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CERTIFICATE OF SERVICE

I CERTIFY that on January 28, 2020, a true and correct copy of the foregoing Sierra Club Petition to Intervene was served upon the following as indicated below:

By Electronic-Mail:

Assistant Utah Attorneys General

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Dated this 28th day of January, 2020 at Oakland, CA.

/s/ Ana Boyd

Ana Boyd
Research Analyst
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