

Rose Monahan (CA Bar# 329861)
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
Phone: (415) 977-5704
rose.monahan@sierraclub.org

Counsel for Sierra Club

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2021 Integrated
Resource Plan

Docket No. 21-035-09

SIERRA CLUB PETITION TO INTERVENE

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, Sierra Club hereby petitions for leave to intervene in this docket.

In support of this petition, Sierra Club states as follows:

1. 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 in this proceeding on behalf of itself and more than 5,300 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power (“RMP”).
2. 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.

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 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.

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:

Rose Monahan
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
Phone: (415) 977-5704
rose.monahan@sierraclub.org

Ana Boyd
Research Analyst
Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612
Phone: (415) 977-5649
ana.boyd@sierraclub.org

7. Rose Monahan is an attorney in good standing and licensed to practice law in California (CA Bar No. 329861). Ms. Monahan 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(a)(ii).¹

¹ Pursuant to Rule R746-1-107(a)(ii), a certificate of good standing for Ms. Monahan 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 15th day of October 2021.

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan

Sierra Club

2101 Webster Street, Suite 1300

Oakland, California 94612

Telephone: (415) 977-5704

rose.monahan@sierraclub.org



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**

ROSE K. MONAHAN

I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that ROSE K. MONAHAN, #329861, was on the 7TH day of January 2020 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 7TH day of October 2021.*

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

By: _____


Simone Voltz, Supervising Deputy Clerk

CERTIFICATE OF SERVICE

DOCKET NO. 21-035-09

I hereby certify that on this 15th day of October 2021, I delivered true and correct copies of the foregoing **SIERRA CLUB PETITION TO INTERVENE** to the following persons via the method of service indicated below:

By Email:

Rocky Mountain Power

Emily Wegener
Jana Saba

emily.wegener@pacificorp.com
jana.saba@pacificorp.com
datarequest@pacificorp.com
irp@pacificorp.com

Division of Public Utilities

Madison Galt

mgalt@utah.gov

Assistant Utah Attorneys General

Patricia Schmid
Justin Jetter
Robert Moore

pschmid@agutah.gov
jjetter@agutah.gov
rmoore@agutah.gov

Office of Consumer Services

Alyson Anderson
Bela Vastag
Alex Ware

akanderson@utah.gov
bvastag@utah.gov
aware@utah.gov
ocs@utah.gov

Western Resource Advocates

Sophie Hayes
Nancy Kelly
Steven S. Michel

sophie.hayes@westernresources.org
nkelly@westernresources.org
smichel@westernresources.org
callie.hood@westernresources.org

Interwest Energy Alliance

Lisa Tormoen Hickey
Nate Blouin

[lisahickey@newLawgroup.com](mailto:lisahickey@newlawgroup.com)
nate@interwest.org

Utah Clean Energy

Hunter Holman
Kate Bowman

hunter@utahcleanenergy.org
kate@utahcleanenergy.org

