

Rose Monahan (CA Bar #329861)
Sierra Club Environmental Law Program
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Counsel for Sierra Club

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2023 Integrated
Resource Plan

Docket No. 23-035-10

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 4,700 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, the Sierra Club will coordinate with that party to avoid duplicative efforts.

3. The legal rights and interests of the 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 the purposes of protecting the interest 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. The 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. The 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 the Sierra Club to intervene.
6. Notices in this proceeding should be sent to the following:

Rose Monahan
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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

WHEREFORE, the Sierra Club requests leaves to intervene in this proceeding to protect its

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

interest and the interests of its members as they may appear.

DATED this 7th day of April 2023.

Respectfully submitted,

/s/ Rose Monahan

Rose Monahan

Sierra Club

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Supreme Court of California

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

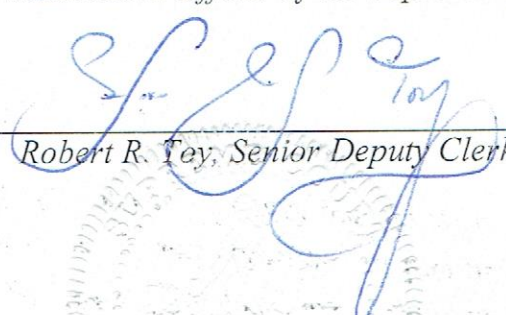
CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

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 3rd day April, 2023.*

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

By: 
Robert R. Tey, Senior Deputy Clerk

