

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR
AUTHORITY TO INCREASE ITS RETAIL
ELECTRIC SERVICE RATES BY
APPROXIMATELY \$140.2 MILLION PER
YEAR OR 21.6 PERCENT AND TO
REVISE THE ENERGY COST
ADJUSTMENT MECHANISM

DOCKET NO. 20000-633-ER-23
RECORD NO. 17252

**SIERRA CLUB
PETITION TO INTERVENE**

April 4, 2023

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**SIERRA CLUB
PETITION TO INTERVENE**

Sierra Club respectfully petitions the Wyoming Public Service Commission (“Commission”) to intervene in the above-captioned proceeding. As grounds for 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. Sierra Club and its over 700,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. The Wyoming Chapter of the Sierra Club is a non-profit member-supported, public interest organization that works to protect Wyoming’s phenomenal natural environment from industrial development while promoting the transition in Wyoming to clean energy and a sustainable economy for the future. The Wyoming Chapter has more than 1,050 members in the state, many of whom are residential customers of Rocky Mountain Power (“Company” or “RMP”). Sierra Club petitions to intervene in this proceeding on behalf of itself and its Wyoming members.

2. Sierra Club's priority is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels, while reducing costs and alleviating energy burden. Participating in General Rate Case dockets is an integral component of this work.

3. Sierra Club members who are residential electric customers of RMP's Wyoming service territory have a direct and substantial interest in this proceeding because the Company is seeking Commission approval to increase its electric service rates by \$140.2 million per annum (21.6% average overall increase) with new rates effective on January 1, 2024. The Company seeks to place into service \$6.7 billion of new capital projects on a total-Company basis through year-end 2024 and proposes increasing net power costs ("NPC") nearly 80 percent from \$1.431 billion (total-Company) to approximately \$2.553 billion (total-Company). Finally, the Company proposes a major modification to the existing Energy Cost Adjustment Mechanism ("ECAM") by eliminating the existing 80/20 sharing band and instead authorizing 100 percent recovery from Wyoming ratepayers.

4. Sierra Club seeks to intervene in this proceeding to ensure that RMP's proposed rates are just and reasonable. The Company's proposed rate increase and proposed modifications to the ECAM would have a substantial impact on Sierra Club's members who are also RMP residential ratepayers.

5. Sierra Club has extensive knowledge and experience in a wide variety of issues related to environmental and energy law. In the last decade, Sierra Club has appeared in countless proceedings before public utility commissions nationwide. Specific to RMP, Sierra Club has intervened in dockets in Wyoming, Washington, Utah, Oregon, Idaho, and California related to the review and analysis of RMP's IRPs, CPCNs, rate cases, fuel dockets, and other matters. The

complex and rapidly changing economic conditions affecting all types of generation impacts the Company's immediate as well as long-term energy decisions. Sierra Club's interests and expertise in this matter will not be adequately represented by any other party to the proceeding. Sierra Club seeks full intervention to help ensure that the Commission and parties have the information and analysis necessary to fully assess RMP's rate requests.

6. Sierra Club's intervention will not unduly burden the issues in this proceeding as Sierra Club does not intend to broaden the scope of the issues presented in the Company's application or which are inherent in this proceeding.

7. Sierra Club's intervention in this proceeding is timely.

8. If Sierra Club's Petition to Intervene is granted, all notices, pleadings, orders, pre-filed testimony, exhibits, discovery, and all other communications should be served upon the following:

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9. For the foregoing reasons, Sierra Club respectfully requests that the Commission grant this petition to intervene in this proceeding and allow Sierra Club to participate as a party.

Dated: April 4, 2023

Respectfully submitted,



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Certificate of Service

I hereby certify that on this 4th day of April 2023, the **Sierra Club Petition to Intervene** was e-filed with the Wyoming Public Service Commission and a true and correct copy was sent, via mail to the following:

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