



January 16, 2020

VIA FEDERAL EXPRESS

Ms. Terri Bordelon
Louisiana Public Service Commission
Records Division
602 N. Fifth St.
Galvez Bldg, 12th Floor
Baton Rouge, LA 70802

Re: LPSC DOCKET NO. U-35441, In re: Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Dear Ms. Bordelon:

Enclosed please find the one (1) original and three (2) copies of the Sierra Club's Motion for Leave to Intervene and for Inclusion on Service List, in the above-referenced proceeding. Please file the original in the record. If you have any questions or require any additional information, please do not hesitate to contact me.

Respectfully submitted,

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cc: SK: MW

2020 JAN 17 AM 10:01

LA PUBLIC SERVICE
COMMISSION

LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION OF
SOUTHWESTERN ELECTRIC POWER
COMPANY FOR APPROVAL OF A
GENERAL CHANGE IN RATES AND
TARIFFS

DOCKET NO. U-35441

2020 JAN 17 AM 10:01
LA PUBLIC SERVICE
COMMISSION

**MOTION FOR LEAVE TO INTERVENE
AND FOR INCLUSION ON SERVICE LIST**

Pursuant to Rule 10 of the Louisiana Public Service Commission ("Commission") Rules of Practice and Procedure, Sierra Club respectfully avers that it is a "party actually in interest" in this Southwestern Electric Power Company ("SWEPCO") electric rate case, and moves to intervene and participate as a party in this proceeding, and asks to be included on the service list.

I.

On December 13, 2020, SWEPCO filed an Application for Approval of a General Change in Rates and Tariffs. In its Application, SWEPCO states that it seeks "authorization to recover its base revenue amounts based upon the updated test year" and "authorization for a five-year extension of SWEPCO's Formula Rate Plan (FRP), beginning with the 2020 test year." Application at 1-2. Contemporaneous with its Application, the company filed the testimonies of two witnesses and has stated that it "anticipates" filing testimonies of additional witnesses in this proceeding. *Id.* at 2. The base rates that SWEPCO seeks in this proceeding will include costs to operate its electric generation units. The company also seeks approval of depreciation rates for certain coal-burning generation units. *Id.* at 4.

Notice of this proceeding was published in the Commission's Official Bulletin No. 1209 on December 27, 2019. Sierra Club is filing this request to intervene within the 25-day intervention period set forth in that bulletin, and therefore this intervention is timely.

II.

Sierra Club is the nation's oldest grassroots environmental advocacy organization, with over 778,000 members nationwide, and 3,268 members residing in Louisiana, some of whom are electric customers of SWEPCO. Sierra Club petitions to intervene in this rulemaking proceeding on behalf of itself and its members who live and purchase utility services in Louisiana.

Sierra Club is dedicated to the protection of public health and the environment. One of Sierra Club's priority national conservation campaigns involves promoting cost-effective renewable energy alternatives and energy efficiency measures as a means to reducing or eliminating reliance on increasingly expensive fossil-fuel generation sources that emit high levels of harmful greenhouse gases and other pollutants. Sierra Club regularly participates in public utility proceedings nationwide and in Louisiana to advocate for robust renewable energy and energy efficiency investments that will produce safe and sustainable jobs, while also reducing both electric system costs and emissions from fossil-fuel energy sources.

Sierra Club seeks to participate in this SWEPCO rate case proceeding, pursuant to Rule 10, to represent and protect the interests of its members, many of whom are residential customers of SWEPCO. Sierra Club and its members have a substantial

interest in the production of affordable, low-polluting, and efficient energy for Louisiana, including for SWEPCO's electric system.

SWEPCO's proposed costs and rates for electric service will include the costs related to the continued operation of its fossil-fuel burning generating units. Sierra Club seeks to intervene in this proceeding to investigate the prudence of SWEPCO's ongoing spending at its coal-burning plants, including any operations and maintenance costs or other costs included in the company's test year spending. As an environmental organization interested in promoting energy conservation, deployment of renewable generation, and reduced reliance on coal-burning generation, Sierra Club has specific interest in the ongoing costs of SWEPCO's generation.

In addition, Sierra Club's participation will help develop a more-thorough record, determine the issues to be decided, and stimulate disclosure of information regarding the prudence of the company's test year spending. Sierra Club is uniquely situated to represent the interests of its members in this proceeding as a result of its expertise and experience in energy policy and law, renewable energy generation, energy efficiency, and environmental regulations that affect the market for energy generation and demand response.

III.

No other party in this proceeding represents the interests of the Sierra Club and its members. The other known parties in interest in this proceeding are SWEPCO and the Alliance for Affordable Energy.

IV.

Sierra Club's motion to intervene is timely, and its participation will not disrupt this proceeding or result in delay. Sierra Club intends to fully abide by all procedural schedules issued by the Commission.

V.

All communications and pleadings in this docket should be directed to:

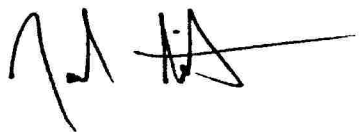
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PRAYER

For these reasons, Sierra Club requests full rights of intervenor status in the above-captioned proceeding; that the Sierra Club be given full and complete standing to participate in any and all meetings as an equal participant in the proceeding; and that all participants in this proceedings be required to serve on the Sierra Club all pleadings, testimony, and correspondence in this docket.

Respectfully submitted this 16th day of January, 2020.



Joshua Smith
Senior Staff Attorney

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On behalf of the Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that I have, on January 16, 2020, served copies of the foregoing pleading upon all other known parties of this proceeding via U.S. Priority Mail.



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