

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 300

In the Matter of

CITY OF PORTLAND'S PETITION
TO INTERVENE

PORTLAND GENERAL ELECTRIC COMPANY,
Investigation of Advice No. 15-09

The City of Portland, Oregon petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Alex Bejarano
Company: City of Portland, Oregon
Portland Bureau of Transportation
1900 SW 4th Ave, Room 7100
City, State, Zip: Portland, OR 97201
Email Address: alex.bejarano@portlandoregon.gov
Telephone: 503-823-7575

2. The petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Benjamin Walters
Company: City of Portland, Oregon
Street Address: 1221 SW 4th Ave, Room 430
City, State, Zip: Portland, OR 97204
Email Address: ben.walters@portlandoregon.gov
Telephone: 503-823-4047

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The City of Portland is a home rule municipal corporation duly organized and existing under the laws of the State of Oregon. The City of Portland has authority under its charter and Oregon statutes to oversee the activities of utilities within its boundaries, and is also responsible for the orderly management of public rights-of-way within its boundaries. The City of Portland has responsibility for planning, building, managing and maintaining an effective and safe transportation system for people and businesses access and mobility. The City of Portland's transportation system includes

approximately 4,800 miles of paved streets, representing \$8.4 billion in infrastructure facilities investments in streets, traffic signals, street lights and other transportation-related structures.

4. The nature and extent of the Petitioner's interest in the proceeding is:

The City of Portland owns and manages hundreds of miles of rights-of-way within the City's limits. Efficiently allocating space within the rights-of-way is one of the major challenges faced in managing the City streets. PGE's tariff has the potential to significantly affect the City's management and regulation of its rights-of-way and increase costs to the City and the City's residents and businesses.

5. The issues the Petitioner intends to raise at the proceeding include:

The City is concerned with the manner in which costs may be allocated for the relocation of utility facilities within the public rights-of-way. The tariff's proposed changes may significantly affect the City of Portland's ability to undertake and complete infrastructure projects.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

The City of Portland has participated as a party in numerous dockets and matters before the Commission. The City of Portland brings a unique perspective to the issues presented in this proceeding.

7. Based on the information provided above in accordance with the Commission's rules of procedure, the City requests to participate in this proceeding as an intervener. The City will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. The City's intervention will not prejudice any party and it accepts the record, procedural schedule and scope of this proceeding as it stands. For all of these reasons, it is in the public interest to grant the City of Portland's Petition to Intervene.

Therefore, the City of Portland respectfully requests that the Commission grant its Petition to Intervene with full party status in this proceeding.

/s/ Benjamin Walters
Benjamin Walters, Chief Deputy City Attorney
Petitioner's Representative

October 14, 2015
Date Signed