

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 300

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

PETITION TO INTERVENE

Investigation of Advice No. 15-09.

The League of Oregon Cities 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: Sean E. O'Day  
Company: League of Oregon Cities  
Street Address: 1201 Court St. NE, Suite 200  
City, State, Zip: Salem, OR 97301  
Email Address: soday@orcities.org  
Telephone: (503) 540-6572

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: See above  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Craig Honeyman  
Company: League of Oregon Cities  
Street Address: 1201 Court St. NE, Suite 200  
City, State, Zip: Salem, OR 97301  
Email Address: choneyman@orcities.org  
Telephone: (503) 588-6550

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

The League of Oregon Cities is a voluntary association of all 242 cities in the State of Oregon. Founded in 1925, the League functions as the collective voice of Oregon's cities by providing advocacy, information and research, education, and member services to Oregon's cities.

List of Members attached

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

The League's membership includes cities subject to the jurisdiction of the Commission and served by PGE. Any decisions made or precedent established in this proceeding may directly affect the League's members.

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

The League intends to address issues of importance to cities in Oregon and their residents. These issues include protection of a city's authority over regulation of its rights of way and the allocation of costs of utility relocations.

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

The League of Oregon Cities has been a local government association for over 75 years and has advocated consistently on behalf of a city's right to manage its rights-of-ways. Additionally, the League has a long history of working with utility companies, the Oregon Public Utility Commission, and cities where the interests of all three converge.

7. Based on the information provided above in accordance with the Commission's rules of procedure, the League of Oregon Cities requests to participate in this proceeding as an intervenor. The League's participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. Therefore, the League respectfully requests that the Commission grant this petition to intervene.

/s/ Sean E. O'Day  
Petitioner or Petitioner's Representative

9/29/2015  
Date Signed

## League of Oregon Cities Members

Adair Village	Dunes City	Klamath Falls	Portland	Veneta
Adams	Durham	La Grande	Powers	Vernonia
Adrian	Eagle Point	La Pine	Prairie City	Waldport
Albany	Echo	Lafayette	Prescott	Wallowa
Amity	Elgin	Lake Oswego	Prineville	Warrenton
Antelope	Elkton	Lakeside	Rainier	Wasco
Arlington	Enterprise	Lakeview	Redmond	Waterloo
Ashland	Estacada	Lebanon	Reedsport	West Linn
Astoria	Eugene	Lexington	Richland	Westfir
Athena	Fairview	Lincoln City	Riddle	Weston
Aumsville	Falls City	Lonerock	Rivergrove	Wheeler
Aurora	Florence	Long Creek	Rockaway Beach	Willamina
Baker City	Forest Grove	Lostine	Rogue River	Wilsonville
Bandon	Fossil	Lowell	Roseburg	Winston
Banks	Garibaldi	Lyons	Rufus	Wood
Barlow	Gaston	Madras	Salem	Woodburn
Bay City	Gates	Malin	Sandy	Yachats
Beaverton	Gearhart	Manzanita	Scappoose	Yamhill
Bend	Gervais	Maupin	Scio	Yoncalla
Boardman	Gladstone	Maywood Park	Scotts Mills	
Bonanza	Glendale	McMinnville	Seaside	
Brookings	Gold Beach	Medford	Seneca	
Brownsville	Gold Hill	Merril	Shady Cove	
Burns	Granite	Metolius	Shaniko	
Butte Falls	Grants Pass	Mill City	Sheridan	
Canby	Grass Valley	Millersburg	Sherwood	
Cannon Beach	Greenhorn	Milton-Freewater	Siletz	
Canyon City	Gresham	Milwaukie	Silverton	
Canyonville	Haines	Mitchell	Sisters	
Carlton	Halfway	Molalla	Sodaville	
Cascade Locks	Halsey	Monmouth	Spray	
Cave Junction	Happy Valley	Monroe	Springfield	
Central Point	Harrisburg	Monument	St Helens	
Chiloquin	Helix	Moro	St Paul	
Clatskanie	Heppner	Mosier	Stanfield	
Coburg	Hermiston	Mt Angel	Stayton	
Columbia City	Hillsboro	Mt Vernon	Sublimity	
Condon	Hines	Myrtle Creek	Summerville	
Coos Bay	Hood River	Myrtle Point	Sumpter	
Coquille	Hubbard	Nehalem	Sutherlin	
Cornelius	Huntington	Newberg	Sweet Home	
Corvallis	Idanha	Newport	Talent	
Cottage Grove	Imbler	North Bend	Tangent	
Cove	Independence	North Plains	The Dalles	
Creswell	Ione	North Powder	Tigard	
Culver	Irrigon	Nyssa	Tillamook	
Dallas	Island City	Oakland	Toledo	
Damascus	Jacksonville	Oakridge	Troutdale	
Dayton	Jefferson	Ontario	Tualatin	
Dayville	John Day	Oregon City	Turner	
Depoe Bay	Johnson City	Paisley	Ukiah	
Detroit	Jordan Valley	Pendleton	Umatilla	
Donald	Joseph	Philomath	Union	
Drain	Junction City	Phoenix	Unity	
Dufur	Keizer	Pilot Rock	Vale	
Dundee	King City	Port Orford		

CERTIFICATE OF SERVICE

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I certify that, on this day, I hereby caused to be served the foregoing document upon all parties of record in this proceeding by mailing a copy by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 29th day of September, 2015, at Salem, Oregon.

/s/ Sean E. O'Day

General Counsel

League of Oregon Cities

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