

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1790**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	
	)	PETITION TO INTERVENE OF SMALL
2017-2021 Renewable Portfolio Standard	)	BUSINESS UTILITY ADVOCATES
Implementation Plan	)	
	)	
	)	

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Pursuant to ORS 756.525, and OAR 860-001-0300, Small Business Utility Advocates, (“SBUA”) petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

1. The contact information for SBUA to be included on the service list is:

James Birkelund SBUA  
548 Market Street, Ste 11200  
San Francisco, CA 94104  
[james@utilityadvocates.org](mailto:james@utilityadvocates.org)

2. SBUA will be represented in this matter by the following:

Diane Henkels  
Of Counsel,  
Cleantech Law Partners, PC  
420 SW Washington St. Ste 400  
Portland, OR 97204  
Tel: 541-270-6001  
[dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com)

Lolly Anderson  
Cleantech Law Partners, PC  
1724 SE Taylor St.  
Portland, OR 97214  
Tel: 619-995-1057  
[landerson@cleantechlaw.com](mailto:landerson@cleantechlaw.com)

3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has approximately 200 members, of which many are Oregon-based entities and of which some are Pacific Power small nonresidential customers, including those with Schedule 23 electric service, and membership includes at least two member organizations with several members which are located in or have done business in different parts of Oregon. SBUA provides information and assistance with regard to utility conservation

measures available to small business, notify the small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provide advice to small businesses with respect to utility service. The nature and extent of SBUA's interest in this docket includes representation of Pacific Power small business ratepayers, and other small business ratepayers.

4. SBUA intends to focus comments on where this updated 2017-2021 Renewable Portfolio Standard ("RPS") compliance filing impacts SBUA interests including in-depth analysis of the impact of SB 1547 on the Company's long-term RPS compliance outlook and corresponding impact on small nonresidential customers, cost calculations having impact ascertainable to SBUA on small nonresidential customers, forecast of electricity sales to its Oregon small nonresidential consumers, as may be ascertained in information presented. SBUA may also comment regarding integrated resource plans under OAR 60-083-0400(6).
5. SBUA has special knowledge or expertise to contribute to this docket from previous experience in the preceding RPS docket, UM 1754, regarding the same utility and similar topic. SBUA has testified and otherwise participated in matters before the Commission and the Oregon Legislature regarding the relation of small businesses in a wide variety of industries with regard to the impact on small business of rate changes and supply chain aspects of a shift to more renewable energy. Additionally, SBUA's legal counsel has significant experience in utility regulatory matters, including advising residential and small business clients in rate-making in electricity and water-related matters.
6. SBUA's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding, and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.
7. SBUA requests the addresses above be added to service list.

RESPECTFULLY SUBMITTED August 1, 2016.



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Diane Henkels  
Cleantech Law Partners PC  
Counsel for Small Business Utility Advocates