

# Davison Van Cleve PC

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June 18, 2019

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,  
General Capacity Investigation  
**Docket No. UM 2011**

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 2011**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) PETITION TO INTERVENE OF THE  
OREGON, ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
 )  
General Capacity Investigation. )  
\_\_\_\_\_ )

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Alliance of Western Energy Consumers (“AWEC”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7). In support of this petition, AWEC represents as follows:

1. The business address of AWEC is:  
  
Alliance of Western Energy Consumers  
818 SW 3rd Ave., #266  
Portland, OR 97204
2. AWEC will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to this proceeding should be served on AWEC’s attorneys and consultant at the following addresses:

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Counsel for AWEC

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. A list of AWEC members is included as Attachment A. Many members of AWEC are customers of PacifiCorp and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. The Commission opened its general capacity investigation at the Commission’s April 23, 2019 Open Meeting. The purpose of the Commission’s investigation is to examine how capacity should be defined, acquired, and valued in light of rapidly changing energy markets. Any change in how such capacity is valued could directly affect those of AWEC’s members who purchase power from PacifiCorp and PGE. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s and PGE’s rates.

5. AWEC represents the interests of a number of large customers served by PacifiCorp and PGE in Oregon. AWEC also has significant experience participating in proceedings before the Commission. AWEC’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.

6. As described above, AWEC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by

any Commission determination made in connection with this proceeding. It is in the public interest to allow AWEC to intervene in this proceeding.

WHEREFORE, AWEC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 18th day of June, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Riley G. Peck

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Of Attorneys for the

Alliance of Western Energy Consumers

**ATTACHMENT A**  
**MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS**

Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcor Rigid Plastics  
Axiall, Inc.  
Basic American Foods  
#\*Boeing  
#\*Boise Cascade, LLC  
BYU Idaho  
#Columbia Steel  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
\*Evraz, Inc.  
#Freres Lumber Co.  
#Georgia-Pacific  
Idahoan Foods  
Inland Empire Paper Co.  
\*Intel Corp  
#\*International Paper  
Johnson Controls, Inc.  
\*J.R. Simplot  
Kaiser Aluminum Trentwood Facility  
#Kapstone Kraft Paper  
Lamb Weston  
#\*Legacy Health  
Microsoft Corporation  
Nippon Dynawave  
#\*Norpac Foods  
North Pacific Paper Company  
#Northwest Hardwoods  
NW Innovation Works  
On Semiconductor  
#\*Packaging Corporation of America  
Pendleton  
Ponderay Newsprint  
#Precision Castparts  
REC Solar Grade Silicon LLC  
\*Schnitzer Steel  
Shell Oil Products US  
Solvay Chemicals

Supreme Perlite Co.  
Swanson Group  
Tesoro Refining and Marketing Co.  
#Timber Products, Inc.  
United States Gypsum Co.  
#Wah Chang  
\*WestRock  
#Weyerhaeuser NR Co.

*#Denotes PacifiCorp Customers*

*\*Denotes PGE Customers*