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April 15, 2021

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 PACIFICORP, dba PACIFIC POWER,
Investigation in Schedule 272, Renewable Rider Optional Bulk Purchase.
Docket No. UM 2163

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Petition to Intervene 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 2163

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER) PETITION TO INTERVENE OF THE
) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
Investigation in Schedule 272, Renewable Rider)
Optional Bulk Purchase.)
_____)

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.

(“DVC”). All documents relating to this proceeding should be served on AWEC’s attorneys and DVC’s Paralegal at the following addresses:

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Attorney for AWEC

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. Many members of AWEC are customers of PacifiCorp (or “Company”).

4. On April 7, 2021, the Commission opened its investigation into PacifiCorp’s Schedule 272, pursuant to Order No. 21-090. The Commission expects the investigation into Schedule 272 will, among other things, “determine...whether PacifiCorp’s use of this tariff to add a resource to its portfolio for the express purpose of delivering the RECs from that specific resource to a participating customer or customers is in the public interest.” Any Commission determination in this proceeding will directly impact AWEC’s members who purchase power from PacifiCorp. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp’s rates and programs. 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 15th day of April, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the Alliance of Western Energy
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