



Oregon Consumer Justice Law
850 SE 3rd Ave., Ste. 302
Portland, Oregon 97214
(503) 406-3311

November 27, 2023

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,
Modifications to Rule 4, Application for Electrical Service
Docket No. UE 428

Dear Filing Center:

Please find enclosed Oregon Consumer Justice's 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/ Robert Le

Robert Le, attorney
Legal Director OCJ Law



BEFORE THE PUBLIC UTILITY COMMISSION OF

OREGON

UE 428

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER) PETITION TO INTERVENE OF
) OREGON CONSUMER JUSTICE
)
Proposed Modifications to Rule 4,)
Application for Electrical Service.)
_____)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Oregon Consumer Justice (“OCJ”) hereby petitions the Oregon Public Utility Commission (“Commission”) to permit OCJ to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7).

In support of this petition, OCJ represents as follows:

1. The business address of Oregon Consumer Justice is:

Oregon Consumer Justice
3055 NW Yeon Ave., Box 1336
Portland, OR 97210

2. Oregon Consumer Justice will be represented in this proceeding by OCJ

attorneys Robert Le and Matthew S. Kirkpatrick, and paralegal Lucia Becchetti. OCJ requests that service of documents be made at the following address and e-mail addresses:

Oregon Consumer Justice
850 SE 3rd Ave., Ste. 302
Portland, OR 97214
E-mails: rl@ocjlaw.com
mk@ocjlaw.com
lb@ocjlaw.com
Telephone: (971) 421-4489

3. Oregon Consumer Justice is an Oregon non-profit corporation with offices in Portland, Oregon. OCJ is a statewide organization dedicated to expanding and protecting the rights of consumers, advancing justice for every Oregonian. We strengthen and safeguard Oregon consumers' rights through advocacy, community engagement, and the law. Together, we're stopping unfair and predatory practices that strip wealth and resources from our families and communities.

4. On October 24, 2023, PacifiCorp filed its Advice No. 23-018 - Rule 4 - Application for Electrical Service. The Company's proposed modifications to Rule 4 will substantially and directly affect those of OCJ's members who purchase power from PacifiCorp. OCJ requests leave to intervene in this Docket to represent Oregon consumers who would be affected by the proposed change to PacifiCorp's tariff by adding limitations on its liability for so-called "a-typical" damages.

5. OCJ represents the interests of all consumers served by PacifiCorp in Oregon. OCJ'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, OCJ 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 OCJ to intervene in this proceeding.

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

Dated this 28th day of November, 2023.

Respectfully submitted,

OREGON CONSUMER JUSTICE

s/ Matthew S. Kirkpatrick

Robert Le

Matthew S. Kirkpatrick

850 SE 3rd Ave., Ste. 302

Portland, Oregon 97214

(971) 421-4489 (phone)

rl@ocjlaw.com

mk@ocjlaw.com,

Of Attorneys for Oregon Consumer Justice