

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1050

IN THE MATTER OF:)	
)	
PACIFICORP INITIATES)	PETITION TO INTERVENE OF
INVESTIGATION INTO MULTI-)	SMALL BUSINESS UTILITY
JURISDICTIONAL ISSUES)	ADVOCATES
)	
)	
)	

Pursuant to ORS 756.525 and OAR 860-001-0300(2), 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 Petitioner to be included on the service list is:

James Birkelund
SBUA
548 Market Street, Suite 11200
San Francisco, CA 94104
james@utilityadvocates.org

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

Diane Henkels, Attorney
SBUA
621 SW Morrison St. Ste 1025
Portland, OR 97205
Tel: 541.270.6001
diane@utilityadvocates.org

William Steele
Bill Steele and Associates, LLC
P.O. Box 631151
Highlands Ranch, CO 80164
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3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. Many of SBUA's members are Oregon-based entities and their electric power needs are served by PacifiCorp dba Pacific Power ("Company"). SBUA provides information and assistance to small business with regard to utility matters. SBUA represents small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provides advice to small businesses with respect to utility service. The nature and extent of SBUA's interest in this docket includes examining Company's proposed 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol Agreement, and methodology used during an interim period, for fairness and reasonableness to Oregon's small nonresidential ratepayers.

4. SBUA has special knowledge and expertise to contribute to this docket from the perspective of small firms in the State of Oregon. SBUA and its legal counsel have substantial expertise working with and representing small business generally, and significant experience in utility regulatory matters, including representing and advising small business in ratemaking and other utility regulatory matters. SBUA's expert is a seasoned consultant, former utility commission staff, and regular instructor for electric utility ratemaking seminars.

5. SBUA has a direct and substantial interest in this proceeding that is not represented by any other party, and will be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow SBUA to intervene in this proceeding. SBUA's intervention 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. SBUA timely files this Petition to Intervene by December 16, 2019, per the Administrative Law Judge's Prehearing Conference Memorandum issued December 10, 2019.

7. SBUA requests the addresses above be added to the service list.

RESPECTFULLY SUBMITTED December 16, 2019



s/ Diane Henkels

Diane Henkels
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