

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UE 324

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Advice No. 17-05 (ADV 523), Schedule
134 Gresham Privilege Tax Payment
Adjustment.

PETITION TO INTERVENE

The City of Gresham petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: David R. Ris
Company: City of Gresham
Street Address: 1333 NW Eastman Parkway
City, State, Zip: Gresham, OR 97030
Email Address: david.ris@greshamoregon.gov
Telephone: 503-618-2429

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: David R. Ris
Company: City of Gresham
Street Address: 1333 NW Eastman Parkway
City, State, Zip: Gresham, OR 97030
Email Address: david.ris@greshamoregon.gov
Telephone: 503-618-2429

Name: Irion Sanger
Company: Sanger Law P.C.
Street Address: 1117 SE 53rd Avenue
City, State, Zip: Portland, OR 97215
Email Address: irion@sanger-law.com
Telephone: 503-756-7533

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

N/A

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

N/A - The City of Gresham is a municipal corporation of the State of Oregon.

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

The City of Gresham's interest in this matter is to ensure that Gresham residents and businesses are only charged lawful rates that are fair, just, and reasonable.

5. The issues the Petitioner intends to raise at the proceeding are:

The issues to be raised by the City of Gresham is that the applicable criteria of ORS 757.259(1) have not been met; that the proposal violates the rule against retroactive ratemaking; and that the proposal results in rates that are not fair, just, and reasonable. The City of Gresham reserves the right to raise additional issues in this proceeding. The City of Gresham respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings..

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

The City of Gresham has special knowledge and expertise in this proceeding because Gresham passed Resolution No. 3056 in May 2011 to set the appropriate license fee amount within the City of Gresham. Resolution No. 3056 increased the City of Gresham's utility license fees on a prospective basis effective on July 1, 2011. PGE did not collect the majority of those license fees and Advice No. 17-05 seeks to retroactively recover those license fees. The City of Gresham's residents and business will be directly impacted and pay higher rates if the Commission approves Advice No. 17-5, and no other party can adequately represent the City of Gresham's interest in this proceeding.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ David R. Ris

David R. Ris, OSB No. 833588
Attorney for Petitioner City of Gresham

April 24, 2017

Date Signed