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March 12, 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 PORTLAND GENERAL ELECTRIC CO.
Application for the Deferral of Storm-Related Restoration Costs
Docket No. UM 1817

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 1817

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY,) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
)
Application for the Deferral of Storm-Related)
Restoration Costs.)

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 attorney and consultant at the following addresses:

Tyler C. Pepple	Dr. Marc M. Hellman
Davison Van Cleve, P.C.	2760 Eagle Eye Ave. NW
1750 SW Harbor Way, Suite 450	Salem, OR 97304
Portland, OR 97201	E-Mail: drmarchellman@gmail.com
E-Mail: tcp@dvclaw.com	Telephone: (503) 290-4660
Telephone: (503) 241-7242	Consultant for AWEC
Attorney for AWEC	

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

4. AWEC has a substantial interest in the outcome of PGE’s application for deferred accounting of storm-related restoration costs, which the Company filed on January 11, 2017. Any deferral of such costs for later ratemaking treatment could directly affect those of AWEC’s members who purchase power from PGE. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s rates.

5. AWEC represents the interests of a number of large energy consumers served by PGE in Oregon. 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 12th day of March, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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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
Ampcor Rigid Plastics
Axiall, Inc.
Basic American Foods
*Boeing
*Boise Cascade, Inc.
BYU Idaho
Columbia Steel
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
*Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Idahoan Foods
Inland Empire Paper Co.
*Intel Corp
*International Paper
Johnson Controls, Inc.
*JR Simplot
Kaiser Aluminum Trentwood Facility
Kapstone Kraft Paper
Lamb Weston
*Legacy Health
Microsoft Corporation
Nippon Dynawave Packaging Co.
*Norpac Foods
North Pacific Paper Co.
Northwest Hardwoods
NW Innovation Works
On Semiconductor
*Oregon Health Sciences University
*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
United States Gypsum Co.
University of Oregon
Wah Chang
*WestRock
Weyerhaeuser NR Co.

**Denotes PGE Customers*