

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1818

COLUMBIA BASIN ELECTRIC
COOPERATIVE, INC. an Oregon
cooperative corporation

Complainant,

v.

UMATILLA ELECTRIC
COOPERATIVE, INC., an Oregon
cooperative corporation

Defendant;

Regarding Willow Creek Dairy

PETITION TO INTERVENE OF GREG TE
VELDE

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Greg te Velde, dba Willow Creek Dairy (“te Velde”) hereby petitions to intervene in the above-captioned proceeding and seeks party status as provided in OAR 860-001-0300(6). In support of this Petition to Intervene, te Velde states as follows:

1. The name and address of te Velde as a party of record in this proceeding is:

Greg te Velde
5850 Avenue 160
Tipton, CA 93272
Email: gitevelde@aol.com
Phone: 559-799-9111

Mr. te Velde should be included on the service list.

2. te Velde will be represented by counsel in this proceeding. The contact information for te Velde’s counsel to be included on the service list is:

Michael B. Collins
Collins & Collins, LLP
326 SE Second Street
P.O. Box 1457
Pendleton, OR 97801

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Email: mike@pendletonlaw.net
Phone: (541) 276-3320

3. Additional contacts to be included on the service list:

Jeddie Aylett
75816 Frontage Lane
Hermiston, OR 97838
Phone: 541-571-2477
Email: aylettjeddie@yahoo.com

4. The nature and extent of te Velde’s interest in this proceeding is as follows:

te Velde is engaged in an irrigated farming operation in Morrow County, Oregon, that is the subject of the Columbia Basin Electric Cooperative, Inc. (“CBEC”) Complaint and the Answer of Umatilla Electric Cooperative, Inc. (“UEC”) in this proceeding. te Velde currently has a dairy that he operates under the assumed business name “Willow Creek Dairy” at a rented location in Morrow County, Oregon. He is in the process of moving that dairy to property he has purchased in Morrow County, Oregon that he had previously operated under the assumed business name “Willow Creek Dairy” and that he now operates under the assumed business name “Lost Valley Farm”. te Velde currently uses UEC to service his entire operation at Lost Valley Farm. te Velde will be directly affected by the outcome of this proceeding in that, if CBEC is granted the relief requested in its Complaint, te Velde will be required to convert to a two power source system which he believes will increase his operating costs, decrease the efficiency of his operation, and create a risk of damage to his operation.

5. The issues te Velde intends to raise in the proceeding are whether he should be required to convert a portion of his farming operation to CBEC service, and the effect such a conversion would have on his farming operation.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

6. te Velde and certain individuals employed by te Velde have special knowledge and expertise with regard to the nature of the te Velde farming operation that would assist the Commission in resolving the issues in this proceeding.

7. Based upon the information provided above in accordance with the Commission's rules of procedure, te Velde respectfully requests to participate in this proceeding as an intervenor. Such participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

DATED this 28th day of March, 2017.

COLLINS & COLLINS, LLP

By Michael B. Collins
Michael B. Collins, OSB#801951
of Attorneys for Greg te Velde