

August 8, 2017

Troy Greenfield

Admitted in Washington and Oregon T: 206-407-1581 C: 206-419-5041 tgreenfield@schwabe.com

VIA ELECTRONIC FILING

Public Utility Commission of Oregon 201 High Street SE, Suite 100 Salem, OR 97301-3398

Attn: Filing Center

RE: Docket No. UM 1837 - Investigation into the Treatment of New Facility Direct Access Loads

Vitesse LLC encloses for filing its petition to intervene in the above-referenced proceeding.

If you have any questions about this filing, please contact me at 206.407.1581 or Bill Ohle at 503.796.2414.

Best regards,

Troy Greenfield

TGR Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1837

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

Investigation into the Treatment of New Facilities Direct Access Loads.

PETITION TO INTERVENE OF VITESSE LLC

.

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Vitesse LLC ("Vitesse")

hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(7). Vitesse is a limited liability company that is wholly-owned by Facebook, Inc. Vitesse owns and operates a large data center in Prineville, Oregon ("Data Center"). In support of this Petition to Intervene, Vitesse states as follows:

1. The name and address of Vitesse as a party of record in this prodceeding is:

Vitesse LLC Attn: R. Bryce Dalley Energy Manager Facebook, Inc. 1 Hacker Way 503.758.2161 rbd@fb.com

2. Vitesse will be represented in this proceeding by Schwabe Williamson & Wyatt,
P.C. All documents relating to this proceeding should be served on Vitesse's attorneys and
Page 1 - PETITION TO INTERVENE OF VITESSE LLC
Schwabe, WILLIAMSON & WYATT, P.C. Attorneys at Law
1420 5th Avenue, Suite 3400 Seattle, W93101-4010 Telephone: 206.622.1711

representatives:

Troy Greenfield Schwabe Williamson & Wyatt 1420 Fifth Avenue, Suite 3400 Seattle, WA 98101 Phone: 206.407.1581 tgreenfield@schwabe.com William J. Ohle Schwabe Williamson & Wyatt 1211 SW Fifth Ave., Suite 1500 Portland, OR 97204 Phone: 503.796.2414 wohle@schwabe.com

3. The Data Center is within the service territory of Pacific Power & Light Company ("Pacific Power") and is comprised of one or more facilities having a total average demand well in excess of 10 MW. Vitesse purchases power for the Data Center from Pacific Power pursuant to the Schedule 48 rate approved by this Commission. Vitesse has a direct and substantial interest in Pacific Power's direct access tariff, including but not limited to treatment of new loads.

4. No other party to this proceeding can adequately represent Vitesse's interests in this proceeding.

5. Vitesse offers the Commission a unique perspective as an operator of a large, central Oregon data center, with possible future new load requirements.

6. Vitesse's participation in this docket will assist the Commission in assessing and resolving the issues, and will not unreasonably broaden the issues, burden the record or delay the proceedings.

Accordingly, Vitesse respectfully requests that the Commission grant this petition, affording Vitesse full party status.

///

///

///

Page 2 - PETITION TO INTERVENE OF VITESSE LLC

SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law 1420 5th Avenue, Suite 3400 Seattle, WA 98101-4010 Telephone: 206.622.1711 Dated this 8th day of August, 2017.

SCHWABE, WILLIAMSON & WYATT, P.C.

By:

Troy Greenfield

Email: tgreenfield@schwabe.com Telephone: 206.407.1581

Page 3 - PETITION TO INTERVENE OF VITESSE LLC

PDX\124124\183600\TGR\21277940.1

SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law 1420 5th Avenue, Suite 3400 Seattle, WA 98101-4010 Telephone: 206.622.1711