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Via Electronic Mail - puc.filingcenter@state.or.us

July 24, 2018

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301-3398
Attn: Filing Center

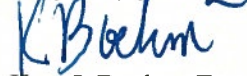
Re: Case No. UM 1920

Dear Sir or Madam:

Please find attached the PETITION TO INTERVENE OF THE KROGER CO. AND QUALITY FOOD CENTERS, DIVISION OF THE FRED MEYER STORES, INC. for filing in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,



Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

KJBkew

Enclosure

cc: Certificate of Service

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1920

In The Matter Of Application of PORTLAND	:	PETITION TO INTERVENE OF
GENERAL ELECTRIC COMPANY For An Order	:	FRED MEYER STORES, INC., A SUBSIDIARY OF
Approving The Deferral Of 2018 Net Benefits	:	THE KROGER CO. AND QUALITY FOOD
Associated With The U.S. Tax Reconciliation Act	:	CENTERS, A DIVISION OF THE FRED MEYER STORES, INC.

Pursuant to ORS §756.525 and OAR §860-001-0300, Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc. ("Fred Meyer") hereby petitions to intervene in this proceeding with full party status as described in OAR §860-001-0010(7). In support of this petition, Fred Meyer represents as follows:

NAME OF PETITIONER: Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc.
ADDRESS: Attn: Corporate Energy Manager, 1014 Vine Street, Cincinnati, Ohio 45202
PHONE NUMBER: 513-762-4538 FAX NUMBER: 513-421-2764
E-MAIL ADDRESS: dgeorge@kroger.com - Please do NOT include this contact on the service list.

**NAME OF COUNSEL FOR PETITIONER: Kurt J. Boehm and Jody Kyler Cohn
Boehm, Kurtz & Lowry**
COUNSEL'S ADDRESS: 36 East Seventh Street., Suite 1510, Cincinnati, OH 45202
COUNSEL'S PHONE NUMBER: 513-421-2255
COUNSEL'S FAX NUMBER: 513-421-2764
COUNSEL'S E-MAIL ADDRESS: kboehm@BKLawfirm.com , jkylercohn@BKLawfirm.com

NAME OF CONSULTANT FOR PETITIONER: Kevin C. Higgins – Energy Strategies Inc.
CONSULTANT'S ADDRESS: 215 South State Street, Suite 200, Salt Lake City, UT 84111
CONSULTANT'S PHONE NUMBER: 801-355-4365
CONSULTANT'S FAX NUMBER: 801-521-9142
CONSULTANT'S E-MAIL ADDRESS: khiggins@energystrat.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:
The Petitioner is seeking intervention on its own behalf as a customer of Portland General Electric Company ("PGE"). Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner operates approximately 36 grocery and discount department stores in the service territory of Portland General Electric Company. The total load of Petitioner is approximately 32 MW. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

This docket concerns the deferral of benefits from the recent federal income tax reduction. Fred Meyer intends to raise issues related to the amount of the deferral and the allocation of any savings between customer classes including Direct Access customers.

Fred Meyer has intervened and is currently participating in PGE Rate Case #UE 335. In the course of Fred Meyer's participation in that docket, it has become clear that some important issues relating to the deferral of federal income tax savings may be resolved in this docket.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc. requests to participate in this proceeding as an intervenor with full party status. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.



Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

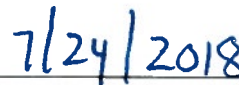
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Date

COUNSEL FOR THE KROGER CO.

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 24th day of July, 2018.



Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

OREGON CITIZENS' UTILITY BOARD

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