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February 22, 2016

Via Electronic Filing

Public Utilities Commission of Oregon
Filing Center
POB 2148
Salem, OR 97308
puc.filingcenter@state.or.us

Re: PACIFICORP, dba PACIFIC POWER
2017-2021 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1754

Dear Filing Center:

Enclosed for filing in the above-referenced docket please find the Petition to Intervene on behalf of Small Business Utility Advocates ("SBUA").

Please contact me at dhenkels@cleantechlaw.com or 541-270-6001 if you have any questions. Thank you for your assistance in this matter.

Sincerely,

/s/ Diane Henkels

Diane Henkels,
Cleantech Law Partners, PC
Counsel for SBUA

Enclosure

www.CleantechLaw.com

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1754

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER)
) PETITION OF SMALL BUSINESS
2017-2021 Renewable Portfolio Standard) UTILITY ADVOCATES TO INTERVENE
Implementation Plan)
)
)
)
)
)

Pursuant to ORS 756.525, and OAR 860-001-0300, Small Business Utility Advocates, (“SBUA”) petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

1. The contact information for SBUA to be included on the service list is:

James Birkelund SBUA
548 Market Street, Ste 11200
San Francisco, CA 94104
james@utilityadvocates.org

2. SBUA will be represented in this matter by the following:

Diane Henkels
Of Counsel,
Cleantech Law Partners, PC
420 SW Washington St. Ste 400
Portland, OR 97204
Tel: 541-270-6001
dhenkels@cleantechlaw.com

Lolly Anderson
Of Counsel,
Cleantech Law Partners, PC
1724 SE Taylor St.
Portland, OR 97214
Tel: 619-995-1057
landerson@cleantechlaw.com

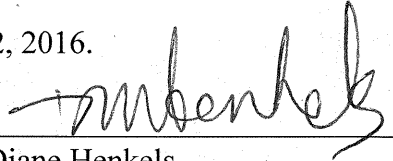
3. SBUA is a nonprofit 501(c)(3) organization that represents, Protects, and promotes the interests of small business utility customers. SBUA has approximately 200 members, of which many are Oregon-based entities and of which some are Pacific Power customers, including those with

Schedule 23 electric service, and membership includes at least two member organizations with several members which are located in or have done business in different parts of Oregon. SBUA provides information and assistance with regard to utility conservation measures available to small business, notify the small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provide advice to small businesses with respect to utility service. The nature and extent of SBUA's interest in this docket includes representation of Pacific Power small business ratepayers, and other small business ratepayers.

4. SBUA intends to focus comments on where this Renewable Portfolio Standard compliance filing impacts SBUA interests. SBUA seeks to review the annual megawatt-hour target for compliance with the applicable renewable portfolio standard based on the forecast of electricity sales to its Oregon small business electricity consumers as may be ascertained in information presented. OAR 860-083-0400(2)(a). SBUA may also comment regarding integrated resource plans under OAR 60-083-0400(6).
5. SBUA has special knowledge or expertise to contribute to this docket from previous experience testifying before and participating in matters before the Commission and the Oregon Legislature regarding the relation of small businesses in a wide variety of industries to Oregon's clean energy economy, and also with regard to the impact on small business of rate changes related to a shift to more energy efficiency and renewables. Additionally, SBUA's legal counsel has significant experience in utility regulatory matters, including advising residential and small business clients in rate-making in electricity and water-related matters.

6. SBUA'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.
7. SBUA requests the addresses above be added to service list.

RESPECTFULLY SUBMITTED February 22, 2016.



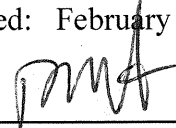
Diane Henkels
Cleantech Law Partners PC
Counsel for Small Business Utility Advocates

CERTIFICATE OF FILING SERVICE

I hereby certify that on February 22, 2016, I served on the following a copy of
 PETITION OF SMALL BUSINESS UTILITY ADVOCATES TO INTERVENE in UM 1754
 PacifiCorp's 2017-2021 Renewable Portfolio Standard Implementation Plan.

CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
PACIFICORP, DBA PACIFIC POWER	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
MICHAEL BREISH (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 michael.breish@state.or.us
JESSE E COWELL (C) DAVISON VAN CLEVE	333 SW TAYLOR ST., SUITE 400 PORTLAND OR 97204 jec@dvclaw.com
R. BRYCE DALLEY PACIFIC POWER	825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 bryce.dalley@pacificorp.com
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MICHAEL T WEIRICH (C) PUC STAFF--DEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us

Dated: February 22, 2016



 Diane Henkels, Cleantech Law Partners PC