

# Davison Van Cleve PC

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February 19, 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 COMPANY,  
Application for Deferred Accounting for Costs and Revenues Associated with the  
Transportation Electrification Plan.  
**Docket No. UM 1938**

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 1938**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY, ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
 )  
Application for Deferral of Costs and Revenues )  
Associated with Transportation Electrification )  
Pilots. )  
\_\_\_\_\_ )

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 attorneys and consultant at the following addresses:

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Counsel for AWEC

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, 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” or “Company”), as indicated on Attachment A.

4. On April 23, 2018, PGE filed its request for deferred accounting of the costs and revenues associated with the Company’s Transportation Electrification Pilots. PGE’s filing also requests a deferral that will support an automatic adjustment clause rate schedule. If approved by the Commission, such deferrals will directly affect those of AWEC’s members who purchase power from PGE. AWEC therefore 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 customers served by PGE in Oregon. AWEC also has significant experience participating in proceedings before the Commission. 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 19th day of February, 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  
Amcor Rigid Plastics  
Axiall, Inc.  
Basic American Foods  
\*Boeing  
\*Boise Cascade, LLC  
BYU Idaho  
Columbia Steel  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
\*Evraz, Inc.  
Freres Lumber Co.  
Georgia-Pacific  
Idahoan Foods  
Inland Empire Paper Co.  
\*Intel Corp  
\*International Paper  
Johnson Controls, Inc.  
\*J.R. Simplot  
Kaiser Aluminum Trentwood Facility  
Kapstone Kraft Paper  
Lamb Weston  
\*Legacy Health  
Microsoft Corporation  
Nippon Dynawave  
\*Norpac Foods  
North Pacific Paper Company  
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, Inc.  
United States Gypsum Co.  
University of Oregon  
Wah Chang  
\*WestRock  
Weyerhaeuser NR Co.

*\*Denotes PGE Customers*