

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 450
1750 SW Harbor Way
Portland, OR 97201

January 4, 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 PACIFICORP, dba PACIFIC POWER,
2019 Renewable Adjustment Clause
Docket No. UE 352

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

UE 352

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,) PETITION TO INTERVENE OF THE
) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
2019 Renewable Adjustment Clause.)
_____)

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:

Tyler C. Pepple	Bradley G. Mullins
Davison Van Cleve, P.C.	1750 SW Harbor Way, Ste. 450
1750 SW Harbor Way, Ste. 450	Portland, OR 97201
Portland, OR 97201	E-Mail: brmullins@mwanalytics.com
E-Mail: tcp@dvclaw.com	Telephone: (503) 954-2852
Telephone: (503) 241-7242	Facsimile: (503) 241-8160
Counsel for AWEC	Consultant for AWEC

Myraleigh A. Alberto
Davison Van Cleve, P.C.
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: maa@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160
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 PacifiCorp (or the “Company”), as indicated on Attachment A.

4. On December 28, 2018, PacifiCorp filed its request to implement the Company’s revised Schedule 202, or Renewable Adjustment Clause, pursuant to the Partial Stipulation adopted by the Commission in Docket No. UE 339. If approved by the Commission, the Company’s revisions to Schedule 202 will substantially and directly affect those of AWEC’s members who purchase power from PacifiCorp. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp’s rates. 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 4th day of January, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

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 PacifiCorp Customers