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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 Deferral of Costs and Revenues Associated with
Electric Vehicle Charging Pilots.
Docket No. UM 2003

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 2003

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 the Electric Vehicle Charging)
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”), as indicated on Attachment A.

4. On February 15, 2019, PGE filed its request to defer for later ratemaking treatment the costs and revenues associated with two Electric Vehicle Charging Pilots. PGE’s filing also requests a deferral of operation and maintenance costs. 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

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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*