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August 30, 2021

***Via Electronic Mail***

Filing Center  
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P.O. Box 1088  
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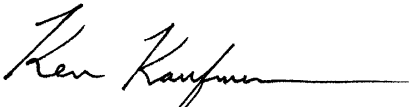
**Re: In the Matter of ALLIANCE OF WESTERN ENERGY CONSUMERS,  
Petition for Investigation into Long-Term Direct Access Programs  
Docket No. UM 2024**

Attention Filing Center:

Attached for filing is an electronic version of *QTS Investment Properties Hillsboro, LLC'S Petition to Intervene*.

Thank you in advance for your assistance.

Sincerely,



Ken Kaufmann  
Attorney for QTS Investment Properties Hillsboro, LLC

Attach.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
Docket No. UM 2024

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In the Matter of ALLIANCE OF WESTERN ENERGY CONSUMERS,  Investigation into Long-Term Direct Access Programs	) ) ) ) ) ) )	PETITION TO INTERVENE OF QTS INVESTMENT PROPERTIES HILLSBORO, LLC.
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**I. INTRODUCTION**

QTS Investment Properties Hillsboro, LLC (“QTS”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

QTS Investment Properties Hillsboro, LLC  
Attn: Travis Wright, VP Energy and Sustainability  
4737 E. Exeter Blvd.  
Phoenix, AZ 85018  
602-935-1877  
Travis.Wright@Qtsdatacenters.com

2. QTS will be represented in this docket by:

Kenneth Kaufmann, Attorney at Law  
1785 Willamette Falls Drive, Suite 5  
West Linn, OR 97068  
Tel: 503-230-7715  
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3. Copies of all pleadings, discovery, Commission orders and other documents should be provided to the following persons:

Kenneth Kaufmann, Attorney at Law  
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QTS Investment Properties Hillsboro, LLC  
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Penny Hargens, VP, Deputy General  
Counsel  
QTS Investment Properties Hillsboro,  
LLC  
12851 Foster Street  
Overland Park, KS 66213  
Legal@qtsdatacenters.com

4. QTS owns the QTS Hillsboro Data Center. The QTS Hillsboro Data Center is a New Large Load Direct Access (“NLDA”) customer of Portland General Electric Company (“PGE”). QTS may, in the future, seek additional service from PGE through its direct access offerings.

QTS Investment Properties Hillsboro, LLC is a foreign limited liability company organized in Delaware. It is a subsidiary of QTS Realty Trust, Inc., which owns and operates data centers throughout the United States.

5. QTS actively participated in recent proceedings related to retail direct access, including Docket UM 2117. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and customers currently participating in direct access including QTS. As the only customer currently taking direct access service under PGE’s Schedule 689, no other

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party is likely to adequately represent QTS' interests in this proceeding. QTS therefore claims a direct and substantial interest in this proceeding.

6. QTS intends to participate herein as a party, and if necessary, to introduce evidence, call and examine witnesses, cross-examine witnesses, and be heard in argument. The nature of evidence and argument which QTS will introduce is dependent upon the nature and effect of other evidence in this proceeding. However, QTS's participation in this docket will not unreasonably broaden the issues, burden the record, or delay this proceeding.

7. QTS may be the only current NLDA customer with party status in this proceeding. As such, it has unique interests, experience, and expertise to contribute to this proceeding.

WHEREFORE, QTS respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

Dated this 30<sup>th</sup> Day of August, 2021.

Respectfully submitted,



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503-230-7715  
ken@kaufmann.law

*of Attorneys for Petitioner QTS Investment  
Properties Hillsboro, LLC*