



Portland General Electric Company
Legal Department
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DONALD J. LIGHT
Assistant General Counsel
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November 12, 2019

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street Southeast, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: UM 2032 – Public Utility Commission of Oregon, Investigation into Treatment of Network Upgrade Costs for QFs

Dear Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric Company's Petition to Intervene.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Donald J. Light". The signature is written in a cursive style.

Donald J. Light
Assistant General Counsel

DJL: dm
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2032**

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Treatment of Network
Upgrade Costs for QFs

**PETITION TO INTERVENE OF
PORTLAND GENERAL ELECTRIC
COMPANY**

Portland General Electric Company (“PGE” or the “Company”) petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-001-0300 and Oregon Revised Statutes (ORS) 756.525. In support of this petition, PGE provides the following.

- a) The name and address of the Company is:

Portland General Electric Company
121 SW Salmon Street
Portland, Oregon 97204

- b) The names and addresses of the persons to be included on the official service list

in this proceeding are:

Donald Light, OSB No. 025415
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- c) PGE is an electric public utility subject to the jurisdiction of the Oregon Public Utility Commission (Commission). Decisions made and precedent established in this proceeding

may directly affect PGE. As such, PGE has a direct and substantial interest in the issues raised in this proceeding.

d) PGE has special knowledge or expertise that may assist the Commission in resolving the issues in the proceeding

e) PGE intends to monitor the proceeding and, if necessary, raise issues and submit testimony appropriate to the proceeding. No other party could adequately represent the interests of PGE.

f) Based on the information provided above in compliance with the Commission's rules of procedures, PGE requests approval to participate in these proceedings as an intervenor. PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

PGE therefore respectfully requests that the Commission grant this petition to intervene.

DATED this 12th day of November, 2019.

Respectfully submitted,



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