

# 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 16, 2020

## *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 PUBLIC UTILITY COMMISSION OF OREGON,  
Investigation into the Treatment of Network Upgrade Costs for  
Qualifying Facilities.  
**Docket No. UM 2032**

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 2032**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) PETITION TO INTERVENE OF THE  
OREGON, ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
 )  
Investigation into the Treatment of Network )  
Upgrade Costs for Qualifying Facilities. )  
\_\_\_\_\_ )

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.

(“DVC”). All documents relating to this proceeding should be served on AWEC’s attorneys and DVC’s paralegal at the following addresses:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
1750 SW Harbor Way, Ste. 450  
Portland, OR 97201  
E-Mail: tcp@dvclaw.com  
Telephone: (503) 241-7242  
Counsel for AWEC

Corinne O. Milinovich  
Davison Van Cleve, P.C.  
1750 SW Harbor Way, Ste. 450  
Portland, OR 97201  
E-Mail: com@dvclaw.com  
Telephone: (503) 241-7242  
Counsel for AWEC

Jesse O. Gorsuch  
Davison Van Cleve, P.C.  
1750 SW Harbor Way, Ste. 450  
Portland, OR 97201  
E-Mail: jog@dvclaw.com  
Telephone: (503) 241-7242  
Paralegal for DVC

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 and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. The Commission opened its investigation into the treatment of qualifying facilities’ network upgrade costs by Order No. 19-254 in Docket No. UM 2000. Any change in how such costs are calculated will directly affect those of AWEC’s members who purchase power from PacifiCorp and PGE. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s and PGE’s rates.

5. AWEC represents the interests of a number of large customers served by PacifiCorp and 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 16th day of January, 2020.

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  
Alcoa  
Amcors Rigid Plastics  
Axiall, Inc.  
Basic American Foods  
#\*Boeing  
#\*Boise Cascade, LLC  
BYU Idaho  
#Columbia Steel  
Dyno Nobel, Inc.  
\*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  
Nippon Dynawave  
North Pacific Paper Company  
#Northwest Hardwoods  
NW Innovation Works  
On Semiconductor  
\*Oregon Health & Sciences University  
#\*Packaging Corporation of America  
Pendleton  
Ponderay Newsprint  
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*  
*\*Denotes PGE Customers*