

# 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

December 10, 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,  
Renewable Resource Automatic Adjustment Clause (Schedule 122).  
**Docket No. UE 370**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Petition to Intervene 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 370**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY, ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
 )  
Renewable Resource Automatic )  
Adjustment Clause (Schedule 122). )  
 )  
\_\_\_\_\_ )

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 independent consultant 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  
Attorney for AWEC

Bradley G. Mullins  
10147 Moratac Drive  
Tualatin, OR 97062  
E-Mail: brmullins@mwanalytics.com  
Telephone: (503) 841-1465  
Consultant 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  
Attorney 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” or the “Company”), as indicated on Attachment A.

4. On December 3, 2019, PGE filed tariff revisions to its Schedule 122, the purpose of which is to recover PGE’s revenue requirements for the owned and contracted wind-related portions of the Wheatridge Renewable Energy Farm. If approved, the Company’s proposed updates to Schedule 122 would have a direct bearing on the rates paid by 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 and programs.

5. AWEC represents the interests of a number of large customers served by PGE in Oregon. AWEC also has significant experience participating in proceedings involving PGE’s rates and programs. 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.

PAGE 2 – PETITION TO INTERVENE OF AWEC

WHEREFORE, AWEC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 10th day of December, 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, Inc.  
BYU Idaho  
Columbia Steel  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials  
\*Evraz, Inc.  
Freres Lumber Co.  
Georgia-Pacific  
Idahoan Foods  
Inland Empire Paper Co.  
\*Intel Corp  
\*International Paper  
Johnson Controls, Inc.  
\*JR Simplot  
Kaiser Aluminum Trentwood Facility  
Kapstone Kraft Paper  
Lamb Weston  
\*Legacy Health  
Microsoft Corporation  
Nippon Dynawave Packaging Co.  
\*Norpac Foods  
North Pacific Paper Co.  
Northwest Hardwoods  
NW Innovation Works  
On Semiconductor  
\*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  
United States Gypsum Co.  
Wah Chang  
\*WestRock  
Weyerhaeuser NR Co.

*\*Denotes PGE Customers*