

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 17, 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)
(BPSC Energy Storage Microgrid and ARC Energy Storage).
Docket No. UE 372

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 372

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))
(BPSC Energy Storage Microgrid and)
ARC Energy Storage).)
_____)

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 10, 2019, PGE filed tariff revisions to its Schedule 122, the purpose of which is to recover PGE’s revenue requirements for the owned Beaverton Public Safety Center and Anderson Readiness Center energy storage microgrid projects. 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

PAGE 2 – PETITION TO INTERVENE OF AWEC

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 17th 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*