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October 7, 2021

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 ALLIANCE OF WESTERN ENERGY CONSUMERS
AND OREGON CITIZENS' UTILITY BOARD,
Application for an Accounting Order Requiring Portland General Electric
Company to Defer Expenses and Capital Costs Associated with the
Boardman Power Plant, **Docket No. UM 2119**;
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Request for a General Rate Revision, **Docket No. UE 394**

Dear Filing Center:

Please find enclosed the Joint Motion to Consolidate of the Alliance of Western
Energy Consumers and the Oregon Citizens' Utility Board in the above-referenced proceedings.

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 2119

UE 394

In the Matter of)	
)	
ALLIANCE OF WESTERN ENERGY)	JOINT MOTION TO CONSOLIDATE
CONSUMERS and OREGON CITIZENS')	OF ALLIANCE OF WESTERN
UTILITY BOARD,)	ENERGY CONSUMERS AND
)	OREGON CITIZENS' UTILITY
Application for an Accounting Order Requiring)	BOARD
Portland General Electric Company to Defer)	
Expenses and Capital Costs associated with the)	
Boardman Power Plant.)	
_____)	
)	
In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY,)	
)	
Request for a General Rate Revision.)	
_____)	

I. INTRODUCTION

Pursuant to OAR § 860-001-0600 and OAR § 860-001-0420, the Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens’ Utility Board (“CUB”) respectfully request a ruling from the Oregon Public Utility Commission (“Commission”) consolidating AWEC and CUB’s Application for an Accounting Order Requiring Portland General Electric Company (“PGE” or “Company”) to Defer Expenses and Capital Costs associated with the Boardman Power Plant (“Application”), docketed as UM 2119, with Docket No. UE 394, PGE’s 2021 general rate case. AWEC and CUB filed their Application on October

8, 2020, and plan to reauthorize it shortly. PGE filed its 2021 general rate case on July 9, 2021. AWEC and CUB have discussed this Joint Motion to Consolidate with Commission Staff and PGE. Commission Staff does not oppose the Joint Motion. PGE opposes the Joint Motion.

II. ARGUMENT

The Commission has previously acted upon its discretion to consolidate cases pursuant to OAR § 860-001-0600 “when consolidation was efficient and logical and when consolidation would clarify and simplify resolution of issues.”^{1/} Consolidation of Docket No. UM 2119 and UE 394 is efficient, logical, and will further the public interest because it will allow the Commission to resolve issues surrounding the Boardman deferral at the same time that the Commission determines PGE’s overall rates in UE 394.

PGE ceased operations at the Boardman plant in 2020. In Docket No. UM 2119, AWEC and CUB requested an order from the Commission requiring PGE to defer the Company’s expenses and capital costs associated with Boardman currently included in PGE’s base rates in accordance with ORS § 757.259(2)(e). As set forth in AWEC and CUB’s Application, deferral is necessary so that customers may capture the reduction in rate base and O&M expenses resulting from the closure of Boardman.

Additionally, as a result of Docket No. UE 394, the Commission will determine PGE rates that are scheduled to go into effect May 2022.^{2/} Issues related to the closure of Boardman are included in the Company’s 2021 general rate case.^{3/} Consolidation of Docket No. UM 2119 and UE 394 is logical given the interconnectedness of the two proceedings and will

^{1/} Docket Nos. UP 415 and UE 219, Ruling (Jan. 26, 2021).

^{2/} UE 394/PGE/100 Pope – Sims/5:20.

^{3/} See UE 394/PGE/700 Jenkins – Cristea/3:9-19;14:4-16; 17:7-11.

support judicial efficiency.

III. CONCLUSION

Consolidation of Docket No. UM 2119 and UE 394 is efficient and logical. In furtherance of the public interest, AWEC and CUB respectfully request that the Commission consolidate Docket No. UM 2119 with UE 394.

Dated this 7th day of October, 2021

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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