

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 2143

In The Matter Of: :
PUBLIC UTILITY COMMISSION OF :
OREGON :
Investigation Into Resource Adequacy in :
Oregon :

**PETITION TO INTERVENE OF
FRED MEYER STORES, INC., A
SUBSIDIARY OF THE KROGER CO. AND
QUALITY FOOD CENTERS, A DIVISION
OF THE FRED MEYER STORES, INC.**

NAME OF PETITIONER: **Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and
Quality Food Centers, a Division of the Fred Meyer Stores, Inc.**

ADDRESS: **Attn: Corporate Energy Manager, 1014 Vine Street, Cincinnati, Ohio 45202**

PHONE NUMBER: **513-762-4538** FAX: **513-762-4012**

E-MAIL ADDRESS: dgeorge@kroger.com - Please do NOT include this contact on the service list.

NAME OF COUNSEL FOR PETITIONER: **Kurt J. Boehm, Esq. and Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY**

COUNSEL'S ADDRESS: **36 East Seventh Street., Suite 1510, Cincinnati, OH 45202**

COUNSEL'S PHONE NUMBER: **513-421-2255** FAX: **513.421.2764**

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NAME OF CONSULTANT FOR PETITIONER: **Justin Bieber, Energy Strategies Inc.**

CONSULTANT'S ADDRESS: **215 South State Street, Suite 200, Salt Lake City, UT 84111**

CONSULTANT'S PHONE NUMBER: **801-355-4365** FAX: **801-521-9142**

CONSULTANT'S E-MAIL ADDRESS: jbieber@energystrat.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The Petitioner is seeking intervention on its own behalf as a customer of Portland General Electric Company. Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner operates approximately 14 grocery and discount department stores in the service territory of Pacific Power. The total load of Petitioner is approximately 10 MW. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

Fred Meyer is a Direct Access customer that intends to address issues related to rules and policies related to Direct Access.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc. requests to participate in this proceeding as an intervenor with full party status. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

/s/ Kurt J. Boehm

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Dated: February 9, 2021

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