

# 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

September 8, 2022

## *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 PACIFICORP, dba PACIFIC POWER,  
Advice No. 22-008, Residential Low-Income Bill Discount.  
**Docket No. UE 409**

Filing Center:

Please find enclosed the Petition to Intervene on behalf 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**

**UE 409**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER ) PETITION TO INTERVENE OF THE  
 ) ALLIANCE OF WESTERN ENERGY  
 ) CONSUMERS  
Advice No. 22-008, Residential Low Income )  
Bill Discount. )  
\_\_\_\_\_ )

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:

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  
Facsimile: (503) 241-8160  
Attorney 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  
Facsimile: (503) 241-8160  
Paralegal for DVC

PAGE 1 – PETITION TO INTERVENE OF AWEC

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  
Facsimile: (503) 241-8160  
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. Many members of AWEC are customers of PacifiCorp (or “Company”).

4. On June 16, 2022, PacifiCorp filed two proposed tariffs: 1) Schedule 7 – Low-Income Discount implementing a residential low-income bill discount for qualifying customers; and 2) Schedule 92 – Low-Income Discount Cost Recovery Adjustment establishing the cost recovery mechanism for the new low-income discount, along with a balancing account and automatic adjustment clause.<sup>1</sup> The calculation of such costs and how they are passed along to customers will substantially and directly affect those of AWEC’s members who purchase power from PacifiCorp. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp’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.

---

<sup>1</sup> Docket No. ADV 1412, PGE Advice Filing 22-008 at 1 (June 16, 2022)  
PAGE 2 – PETITION TO INTERVENE OF AWEC

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 8th day of September, 2022.

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