

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 416**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Request for a General Rate Revision and  
2024 Annual Power Cost Update

UNOPPOSED PETITION TO INTERVENE  
OF COMMUNITY ENERGY PROJECT

Community Energy Project (CEP) respectfully petitions to intervene in this proceeding pursuant to OAR 860-001-0300 and ORS 756.525, to appear and participate as a party with full party status. CEP has conferred with the parties to this docket and reports that they do not oppose this petition. The grounds for intervention are as follows.

1. Contact Information for Petitioner and designated person(s) for service list:

Community Energy Solutions  
2705 E Burnside Street, Suite 112  
Portland, OR 97214  
Charity Fain, Executive Director  
Telephone: (971) 544-8705?  
Email: [Charity@communityenergyproject.org](mailto:Charity@communityenergyproject.org)

2. CEP will be represented by counsel (to be included in service list):

Tonia L. Moro (OSB 893160)  
Tonia L. Moro, Attorney at Law P.C.  
106 Talent Avenue, Ste. 6  
Talent, OR 97540  
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3. CEP seeks intervention on its own behalf and on behalf of the individuals and communities it serves and represents who are customers of Portland General Electric (PGE). CEP is not seeking intervention as a member of or in association with any other organization.

4. CEP is a 501(c)(3) community-based organization that represents Oregon's frontline communities, who are vulnerable to the uncertainty posed by climate change and often struggle to pay existing utility bills. CEP's mission is to create a sustainable, equitable, and green future for those communities, because they deserve safe, healthy, and efficient homes, regardless of income. CEP has a vital, direct and substantial interest in this rate case. One of CEP's long-standing projects provides free services focused on safety and energy efficiency from community education and supplies to direct home energy upgrades and repairs. CEP's participation will help ensure that the interests of these communities are represented in this rate revision process. Without CEP's participation, these communities would be without meaningful participation under current rate contested case proceeding rules.

5. CEP's interests in this proceeding stem from its concern with the significant proposed rate increases that will impact the communities it represents. CEP has not yet determined the full extent of the specific relief it will request but it anticipates participating to the extent necessary to avoid disproportionate impacts on low-income and underserved communities of the decisions informing PGE's rates and its requested rates changes. CEP anticipates focusing on issues related to increased energy efficiency, the sufficiency of the discount program and the bases for the requested profit margin increase. As understood, the interests of these communities are not specifically represented by a party with CEP's focus - such as addressing the impacts of climate change to vulnerable communities and utilizing CEP's expertise in policy and implementation of decarbonizing home energy use. CEP's participation

will assist the Commission in resolving issues impacting these communities.

6. CEP will contribute its special knowledge and expertise in this docket. CEP has participated in numerous PUC proceedings including Northwest Natural's recent general rate case, UG 435 as a member of a coalition. It is experienced in providing testimony and evidence in PUC proceedings. CEP's counsel has over twenty years experience as a trial litigator, and as an appellate and administrative law attorney.

7. CEP's participation in this docket will not unreasonably broaden the issues, burden the record or unreasonably delay the proceedings underway. Moreover, there is good cause to waive rules and requirements that may otherwise pose barriers to CEP's participation. HB 2475 sets forth specific policy and legislative intent to foster participation in PUC proceedings by environmental justice organizations like CEP. These organizations are only recently building capacity to participate due to the funding made available through that legislation. The first round of funding under the Justice Funding Agreement adopted in Order No. 22-033 just recently closed. It was through that process that CEP was able to determine and resolve the scope of its capacity to engage in the PUC proceedings this year. In summary, the importance of environmental justice community representation, the newly evolving program to provide capacity to do so, and CEP's best efforts to determine its capacity in the last month presents good cause to waive procedural barriers to its participation. See, OAR 860-001-000 and the March 10, 2023, ALJ Ruling/Memorandum related to the Justice Funding program filed in this proceeding.

8. Wherefore, CEP respectfully requests that the Commission enter an order granting

CEP permission to intervene in this docket and to participate to the full extent allowed by law so that it may fully represent its interests and the interests of the environmental justice communities it represents.

DATED this April 27, 2023.

/s/Tonia L. Moro  
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Attorney for Community Energy Project