



March 7, 2023

*Via Electronic Filing to [PUC.FilingCenter@state.org.us](mailto:PUC.FilingCenter@state.org.us)*

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,  
Request for a General Rate Revision.  
**Docket No. UE 416**

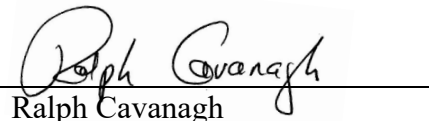
Dear Filing Center:

Please find enclosed the Petition to Intervene from the Natural Resources Defense Council (NRDC) and the NW Energy Coalition (NVEC) in the above-referenced docket.

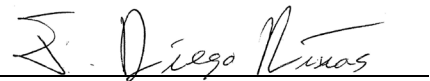
It has been served on all parties of record.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,



Ralph Cavanagh  
NRDC  
415-875-6100



F. Diego Rivas  
NVEC  
406-461-6632

Enclosure

**NATURAL RESOURCES DEFENSE COUNCIL**

111 SUTTER STREET | SAN FRANCISCO, CA | 94104 | T 415.875.6100 | F 415.875.6161 | NRDC.ORG

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. UE 416

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for a General Rate Revision.

PETITION TO INTERVENE OF THE  
NATURAL RESOURCES DEFENSE  
COUNCIL AND THE NW ENERGY  
COALITION

NAME OF PETITIONERS: Natural Resources Defense Council (NRDC) NW Energy Coalition (NVEC)
ADDRESSES: 111 Sutter St., 21st Floor, San Francisco, CA 94104 811 1 <sup>st</sup> Ave, Suite 305, Seattle WA 98104
PHONE NUMBER: 415-875-6100 406-461-6632
FAX NUMBERS: 415-875-6161/none
E-MAIL ADDRESSES: <a href="mailto:rcavanagh@nrdc.org">rcavanagh@nrdc.org</a> , <a href="mailto:diego@nwenergy.org">diego@nwenergy.org</a>

NAMES OF COUNSEL FOR PETITIONERS: Ralph Cavanagh F. Diego Rivas
COUNSELS' ADDRESSES: 111 Sutter St., 21st Floor, San Francisco, CA 94104 1101 8 <sup>th</sup> Ave, Helena, MT 59601
COUNSELS' PHONE NUMBERS: 415-875-6100 406-461-6632
COUNSELS' FAX NUMBERS: 415-875-6161/none
COUNSELS' E-MAIL ADDRESSES: <a href="mailto:rcavanagh@nrdc.org">rcavanagh@nrdc.org</a> , <a href="mailto:diego@nwenergy.org">diego@nwenergy.org</a>

IF THE PETITIONERS ARE ORGANIZATIONS, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATIONS:
NRDC is a nonprofit environmental advocacy organization with more than 10,500 Oregon members and a 50-year history of clean energy advocacy on their behalf before this Commission.
NVEC is a non-profit environmental advocacy organization which represents over 100 environmental, civic, and human service organizations, utilities, and clean energy businesses in Oregon, Washington, Idaho, Montana, and British Columbia. In Oregon, NVEC represents 35 member organizations and about 450 individual members.

List of Members attached.

NATURE AND EXTENT OF THE PETITIONERS' INTEREST IN THE PROCEEDING:

NRDC and NWEA intervened in UE 394 last year to address issues surrounding the future of Portland General Electric's longstanding revenue decoupling mechanism. In this proceeding, we will work with PGE and other parties to propose an updated and improved version of that mechanism for the Commission's consideration. NRDC and NWEA believe that such a mechanism is essential to achieving Oregon's clean energy and decarbonization objectives.

Petitioners also have an interest in PGE's proposals to modify the Power Cost Adjustment Mechanism, its treatment as a covered entity under Washington's Climate Commitment Act, its Distribution System Plan, Transportation Electrification program funding, and associated storage.

THE ISSUES THE PETITIONERS INTEND TO RAISE AT THE PROCEEDING:

In Order No. 22-129 (April 25, 2022), the Oregon PUC indicated its strong interest in addressing the future of revenue decoupling in this proceeding, based on issues raised in UE 394 by NRDC and the NW Energy Coalition. NRDC and NWEA seek intervention to assist the Commission in that effort. PGE has proposed to revive its previous decoupling mechanism with modifications, and our testimony will include an evaluation of that proposal in the broader context of Oregon's clean energy transition and goals.

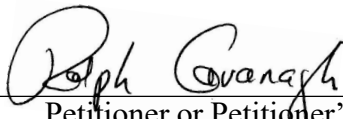
Petitioners also intend to respond to other issues consistent with their interests in this proceeding stated above.

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

Petitioners' counsel, Ralph Cavanagh, is among the nation's leading experts on revenue decoupling. He served as an expert witness in the 2008-2009 proceeding in which the Commission adopted PGE's first revenue decoupling mechanism.

Petitioners' counsel, Diego Rivas, is Regulatory Counsel for the NW Energy Coalition, which has engaged in PGE's development of its Transportation Electrification Plan and Distribution System Plan, and is involved in implementation of Washington's Climate Commitment Act.

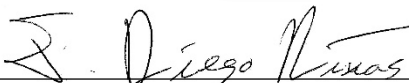
Based on the information provided above in accordance with the Commission's rules of procedure, we request to participate in this proceeding as intervenors. We and the organizations that we represent will not unreasonably broaden the issues, burden the record or unreasonably delay the proceeding. OAR 860-001-0300.



\_\_\_\_\_  
Petitioner or Petitioner's Representative

03/07/23

\_\_\_\_\_  
Date



\_\_\_\_\_  
Petitioner or Petitioner's Representative

03/07/23

\_\_\_\_\_  
Date