

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
107 SE Washington St., Suite 430
Portland, OR 97214

December 19, 2023

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 PORTLAND GENERAL ELECTRIC COMPANY,
Application for Deferral of Costs Associated with Clearwater Wind Project.
Docket No. UM 2306

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Petition to Intervene in the above-referenced docket.

Thank you for your assistance. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2306

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY,) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
)
Application for Deferral of Costs Associated)
with Clearwater Wind Project.)
)
_____)

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:

Tyler C. Pepple
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
E-Mail: tcp@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160
Attorney for AWEC

Jesse O. Gorsuch
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
E-Mail: jog@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160
Paralegal for DVC

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Brent L. Coleman
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
E-Mail: blc@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 Portland General Electric Company (“PGE”).

4. On October 31, 2023, PGE filed its application for deferred accounting treatment of certain expenses associated with the Clearwater Wind Project. If approved, PGE’s deferral request could substantially and directly affect those of AWEC’s members who purchase power from PGE. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s rates and programs.

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

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.

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DAVISON VAN CLEVE, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
Telephone (503) 241-7242

WHEREFORE, AWEC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 19th day of December, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

107 SE Washington St., Suite 430

Portland, OR 97214

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Attorney for the Alliance of Western Energy Consumers