

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 435

In the matter of

Portland General Electric,

Request for a General Rate Revision.

VERDE'S PETITION FOR
INTERVENTION

Verde 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. The grounds and criteria for intervention are as follows.

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

Verde
4145 NE Cully Blvd
Portland, OR 97218

Anahi Segovia Rodriguez
Energy Justice Coordinator
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2. Verde will be represented by co-counsel (to be included in service list):

Tonia L. Moro (OSB 893160)
Tonia L. Moro, Attorney at Law P.C.
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3. Verde 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). Verde is not seeking intervention as a member of or in association with any other organization.

4. Verde is a 501(c)(3) community-based organization based in Portland, Oregon, with the mission to build environmental wealth through organizing, advocacy, and social enterprise. Verde works statewide and is rooted in the Cully neighborhood of Portland, a typical environmental justice community facing energy affordability challenges in the state. Verde's members are largely Indigenous, Black, and Latinx; a majority of Verde's members are low-income and suffer from disproportionate economic and environmental burdens.

5. Verde's interest in this proceeding stem from its concern with the significant proposed rate increases that will impact the communities it represents. Verde 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 proposed rates, rate design and programmatic changes. Verde anticipates focusing on issues related to Return on Investment/Equity, revenue requirement issues in light of resolution of issues in UE 416, measures to reduce energy burden (including energy efficiency and weatherization), and whether the adopted discount program is sufficient or needs new design. As understood, the interests of these communities are not specifically represented by a party with Verde's expertise in bringing climate, environmental and justice investments and benefits to Oregon communities and experience organizing and involving community members in the planning and building of such investments, through

community experience and partnership. Verde's participation will assist the Commission in resolving issues impacting these communities.

6. Verde will contribute its special knowledge and expertise in this docket. Verde has participated in numerous PUC proceedings including Northwest Natural's last general rate case, UG 435 as a member of a coalition, and numerous policy dockets. It is experienced in providing testimony and evidence in PUC proceedings. Verde's counsel have also participated in numerous PUC proceedings, including rate cases

7. Verde's participation in this docket will not unreasonably broaden the issues involved in a General Rate Case, 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 Verde's participation. HB 2475 sets forth specific policy and legislative intent to foster participation in PUC proceedings by environmental justice organizations like Verde. These organizations are only building capacity to participate due to the funding made available through that legislation. State policy recognizing the importance of environmental justice community representation, and the recently developed program to provide capacity to do so presents good cause to exercise discretion in favor of Verde's participation.

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8. Wherefore, Verde respectfully requests that the Commission enter an order granting Verde 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 May 9, 2024.

/s/Tonia L. Moro

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Of Attorneys for Verde