

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**In the Matter of PORTLAND  
GENERAL ELECTRIC  
COMPANY, Petition for  
Certificate of Public Convenience  
and Necessity**

**Docket No. PCN 6  
  
PETITION TO INTERVENE  
  
Save Stafford Road**

Petitioner Save Stafford Road (“Petitioner”) petitions to intervene in the above-entitled proceeding. In support of the Petition, the following is provided:

1. The contact information of the Petitioner to be included on the service list are:

John Lekas, President  
Save Stafford Road  
21956 SW Stafford Road  
Tualatin, OR 97062  
[john@leadercapital.com](mailto:john@leadercapital.com)

Ed Wagner, Secretary  
Save Stafford Road  
21956 SW Stafford Road  
Tualatin, OR 97062  
[edawagner@gmail.com](mailto:edawagner@gmail.com)

2. The Petitioner will be represented by legal counsel in this proceeding. The contact information for Petitioner's legal counsel to be included on the service list is:

Gregory S. Hathaway, OSB No. 731240  
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(503) 303-3101

3. Petitioner is an Oregon non-profit corporation with a total of 50 members. The members of Save Stafford Road live on or near Stafford Road in Clackamas County and will be impacted by Portland General Electric Company's ("PGE") proposed Tonquin Project that is the subject matter of its Petition for a Certificate of Public Convenience and Necessity (Docket No. PCN 6). Petitioner's purpose to Intervene is to learn and understand the scope and nature of the proposed Tonquin Project, how it may potentially affect Petitioner's members, and to ensure that PGE is compliant with all Clackamas County, State of Oregon, or Federal requirements regarding the Tonquin Project. See attached Exhibit A, Petitioner's list of members.

4. The nature and extent of the Petitioner's interest in this proceeding is to assist the Commission in determining the necessity, safety, practicability, and justification in the public interest of the proposed transmission line, consistent with the criteria codified in Commission Order No. 22-351: "CPCN Review Criteria".

5. The preliminary issues identified by Petitioner, based on the limited publicly available information included in PGE's application for a CPCN permit, are as follows:

A. PGE has not demonstrated a need for additional capacity or improved system reliability and more importantly whether the proposed Tonquin Project meets the hypothesized need.

B. PGE has not justified construction of the proposed Tonquin Project as in the public interest as compared with feasible alternatives, given that PGE has failed to evaluate non-wires alternatives such as demand response, distributed generation, battery storage, and the construction of one or more lower-voltage single or multi-circuit lines, all of which are required by OAR 860-025-0030(2)(n).

C. PGE has not identified the sources of energy related to the proposed Tonquin Project as required by OAR 860-025-0030(2)(c)(E).

D. PGE has not provided a complete estimate of both already incurred and forecasted costs of developing the proposed Tonquin Project as required by OAR 860-025-0030(2)(d).

E. PGE has not provided cost estimates for already incurred costs of the proposed Tonquin Project and has not provided any cost estimates associated with expansion of the Rosemont and Wilsonville substations.

F. PGE claims, without evidence, that the Rosemont-Wilsonville line is a “critical” element of the larger proposed Tonquin Project yet provides no substantive information on the already incurred and forecasted costs of the proposed Tonquin Project.

G. PGE has not accurately estimated the levelized annual revenue requirement of the proposed Tonquin Project as a percentage of its estimated annual revenue requirement as required by OAR 860-025-0030(2)(j).

H. PGE’s Revenue Requirement calculation only addresses the revenue requirement associated with the Rosemont to

Wilsonville transmission line and fails to account for the revenue requirements associated with the terminal substations (Rosemont and Wilsonville) nor does PGE provide revenue requirements associated with the incurred and forecasted costs of the larger proposed Tonquin Project.

I. PGE inappropriately estimates the levelized annual revenue requirement as a percentage of PGE's power and distribution revenue requirement by reference to PGE's most recent General Rate Case which is inappropriate and misleading. The costs of PGE's proposed transmission line and much larger Tonquin Project will be included in PGE's transmission revenue requirement which is under jurisdiction of the Federal Energy Regulatory Commission. PGE recently notified the Commission in Docket No. UE 435 that PGE intends to file a new Transmission Rate Case at FERC later this year.

J. Petitioner intends to file an Objection to PGE's Request for a Waiver of OAR 860-025-0030(3) that was filed on April 17, 2024, if Petitioner's Petition to Intervene is granted by the Commission. OAR 860-025-0030(3) requires PGE to provide documentation of any required land use approvals when it files its Petition for a CPCN. Here, PGE is required to have Clackamas County land use approval of its request for an Alteration of

a Non-Conforming Use. As will be explained in Petitioner's Objection, it is unlikely that PGE will be able to meet its burden of proof justifying an Alteration of its Non-Conforming existing poles and transmission lines. As a result, any Waiver of this requirement would be inappropriate under the circumstances. Petitioner respectfully requests the Commission to not grant PGE's Waiver Request until Petitioner has an opportunity to address this issue.

6. The Petitioner will have special knowledge that will assist the Commission in resolving the issues in this proceeding. The Petitioner intends to retain the services of an industry consultant with the skills and experience required to evaluate PGE's compliance with the technical requirements of PGE's filing, including PGE's Highly Confidential Information associated with specifying and interpreting the results of power flow analyses, load forecasting, integrated resource planning, and WECC reliability criteria and planning protocols.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Petitioner respectfully requests the right to participate in this proceeding as an Intervenor. Petitioner

represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Dated this 2<sup>nd</sup> day of May 2024.

SAVE STAFFORD ROAD

By: /s/ John Lekas  
John Lekas, President

By: /s/ Ed Wagner  
Ed Wagner, Secretary

SUBMITTED BY:

HATHAWAY LARSON LLP

By: /s/ Gregory S. Hathaway  
Gregory S. Hathaway, OSB No. 731240  
*Attorneys for Petitioner Save Stafford Road*

## SAVE STAFFORD ROAD - MEMBERS

<b>Name</b>	<b>Address</b>
Bill & Susie Houston	21630 SW Stafford Rd, Tualatin
Brett & Shannon Darrow	22727 SW Stafford Rd, Tualatin
Bryan Weinstein	22301SW Mountain Rd, West Linn
Carol & Ron Schaaf	21929 Stafford Rd, Tualatin
David & Nicole Christie	25900 Stafford Rd, Wilsonville
Edward & Christina Wagner	21620 SW Stafford Rd, Tualatin
Gerri Dick	22720 SW Stafford Rd, Tualatin
Glenda & Scott Burns	23700 SW Stafford Rd, Tualatin
James Bresee	21998 SW Stafford Rd, Tualatin
Jeanie & Jeff Braun	24805 SW Gage Rd, Wilsonville
John Lekas	21956 SW Stafford Rd, Tualatin
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Jason Lee	22400 SW Stafford Rd, Tualatin
Kelly & Sam Bartholomew	22900 SW Stafford Rd, Tualatin
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Mike & Susan Vandenburg	21892 SW Stafford Rd, Tualatin
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Tony & Cathy Barber	22350 Stafford Rd, Tualatin
Travis Sheets	23411Stafford Rd, Tualatin
Todd & Janis Hess	24416 SW Stafford Rd, Tualatin
Keith & Holly Okerstrom	24720 SW Stafford Rd, Tualatin
Ardy Osborn	22201SW Stafford Rd, Tualatin
Anthony & Michelle Ferroggiaro	3880 SW Homesteader Rd, Wilsonville
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George & Sarah Hibard	22303 SW Bar None Rd, Tualatin
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Eileen Hutchinson	24024 SW Stafford Rd, Tualatin
Sharon Kaufmann	21882 SW Stafford Rd, Tualatin
Gary & Vickie Bauer	2455 SW Buckman Rd, Wilsonville
Lyneil Vendermolen	22262 SW Stafford Rd, Tualatin
Robert Heros	3501 SW Turner Rd, West Linn
Barry Mong	24520 SW 65th Ave, Tualatin
Karin Potter	22841 SW Stafford Road, Tualatin