



**Portland General Electric Company**  
Legal Department  
121 SW Salmon Street • 1WTC1301 • Portland, Oregon 97204  
Phone 503-464-8544 • Fax 503-464-2200  
portlandgeneral.com

**Erin E. Apperson**  
Assistant General Counsel  
[erin.apperson@pgn.com](mailto:erin.apperson@pgn.com)

June 15, 2021

***Via Electronic Filing***

Oregon Public Utility Commission  
Attn: Filing Center  
201 High Street Southeast Suite 100  
Post Office Box 1088  
Salem, Oregon 97301

**Re: LC 77 – PacifiCorp, dba Pacific Power’s 2021 Integrated Resource Plan (IRP)**

Attention Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric Company’s Petition to Intervene.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", with a long horizontal flourish extending to the right.

Erin E. Apperson  
Assistant General Counsel

EEA: dm  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 77**

In the Matter of

PACIFICORP, dba PACIFIC POWER,  
2021 Integrated Resource Plan (IRP).

**PETITION TO INTERVENE OF  
PORTLAND GENERAL ELECTRIC  
COMPANY**

Portland General Electric Company (“PGE”) respectfully petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-001-0300 and ORS 756.525.

In support of this petition, PGE provides the following:

- a) The name and address of the Company is:

Portland General Electric Company  
121 SW Salmon Street  
Portland, Oregon 97204

- b) The petitioner will be represented by counsel in this proceeding. The names and addresses of the persons to be included on the official service list in this proceeding are:

Erin E. Apperson, OSB No. 175771  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
Telephone: (503) 464-8544  
Fax: (503) 464-2354  
Email: erin.apperson@pgn.com

Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: (503)  
Fax: (503)  
Email: pge.opuc.filings@pgn.com

- c) PGE is an electric public utility subject to the jurisdiction of the Oregon Public Utility Commission (“Commission”). Decisions made and precedent established in this proceeding may directly affect PGE. As such, PGE has a direct and substantial interest in the issues raised in this proceeding.

d) PGE has special knowledge or expertise that may assist the Commission in resolving the issues in the proceeding.

e) PGE intends to monitor the proceeding and, if necessary, raise issues and submit testimony appropriate to the proceeding. No other party could adequately represent the interests of PGE.

f) Based on the information provided above in compliance with the Commission's rules of procedures, PGE requests approval to participate in these proceedings as an intervenor. PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

PGE therefore respectfully requests that the Commission grant this petition to intervene.

DATED this 15<sup>th</sup> day of June, 2021.

Respectfully submitted,



---

Erin E. Apperson, OSB #175771  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
(503) 464-8544 (phone)  
(503) 464-2354 (fax)  
Erin.apperson@pgn.com