## Davison Van Cleve PC

### Attorneys at Law

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Suite 450 1750 S Harbor Way Portland, OR 97201

April 3, 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,

2023 Clean Energy Plan and Integrated Resource Plan.

Docket No. LC 80

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. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

**Enclosure** 

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

LC 80

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In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	ALLIANCE OF WESTERN ENERGY
COMPANY,	)	CONSUMERS
	)	
2023 Integrated Resource Plan/Clean Energy	)	
Plan.	)	
	)	

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.

Davison Van Cleve, P.C.

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Attorney for AWEC Paralegal for DVC

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Attorney for AWEC

AWEC is an incorporated, non-profit association of large energy 3.

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 March 31, 2023, PGE filed its 2023 Clean Energy Plan and Integrated

Resource Plan. The outcome of these proceedings will 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.

As described above, AWEC has a direct and substantial interest in this 6.

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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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 3rd day of April, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Olson
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