

1  
2  
3 **BEFORE THE PUBLIC UTILITY COMMISSION**

4 **OF OREGON**

5 **UE 179**

6  
7 In the Matter of PACIFIC POWER & LIGHT ) PETITION OF CITY OF  
(dba PacifiCorp) ) PORTLAND TO INTERVENE  
8 Request for a General Rate Increase in the )  
9 Company's Oregon Annual Revenues. )

10 Pursuant to ORS 756.525 and OAR 860-012-0001, the City of Portland respectfully  
11 petitions the Commission for leave to intervene as a party in this proceeding on the following  
12 grounds:

13 1. The City of Portland is a municipal corporation duly organized and existing under  
14 the laws of the State of Oregon.

15 2. For purposes of its participation in this proceeding, correspondence and service  
16 papers should be sent to the City at the following addresses:

17 David Tooze  
18 Office of Sustainable Development  
City of Portland  
19 721 NW 9<sup>th</sup>, Room 350  
Portland, OR 97209  
20 Fax: 503-823-5311  
e-mail: [dtooze@ci.portland.or.us](mailto:dtooze@ci.portland.or.us)

Richard Gray  
Portland Office of Transportation  
1120 S.W. 5th Avenue, Room 800  
Portland, OR 97204  
Fax: 503-823-7609  
e-mail: [richard.gray@pdxtrans.org](mailto:richard.gray@pdxtrans.org)

21  
22 3. Correspondence and service of papers related to this proceeding should be sent to  
23 the City's counsel and consultant at the following address:

24 Deputy City Attorney  
Office of City Attorney  
1220 S.W. 5th Avenue, Room 315  
25 Portland, OR 97204  
26 Fax: 503-823-3089  
e-mail: [bwalters@ci.portland.or.us](mailto:bwalters@ci.portland.or.us)

1           4.     The City of Portland has a substantial interest in PacifiCorp's application for  
2 revised tariffs. The proposed rate changes would substantially and directly affect the City of  
3 Portland as a municipal corporation and as a PacifiCorp customer. This matter is of vital  
4 significance to the City of Portland.

5           (a)     PacifiCorp is one of two private electric utilities that serve citizens and  
6 businesses within Portland. The City has the right and obligation to act to protect the interests of  
7 its citizens in public utility matters. To protect the broad public interest of the citizens of  
8 Portland, the City has an interest in the impact of the revised tariffs upon residential and  
9 commercial electricity customers within the City of Portland.

10           (b)     The City is one of Pacific Power's sizable customers, with over 150  
11 accounts and annual PP&L utility billings of approximately \$850,000. With rates for  
12 commercial accounts projected to possibly increase by up to 19.8%, the City has an obligation to  
13 keep its electricity expenditures low, minimizing costs for taxpayers.

14           (c)     Existing City policies support sustainable energy and environmental  
15 actions, including energy-efficiency services for homeowners and businesses; promotion of  
16 clean, renewable energy resources; and weatherization and bill-paying assistance services for  
17 lower income households.

18           5.     The City will address such issues as it deems relevant to its interests in this  
19 proceeding, including both issues that it identifies itself within the time set for such action and  
20 issues identified by others that may affect City interests.

21           6.     The City's appearance and participation will not unreasonably broaden the issues,  
22 burden the record, or delay this proceeding.

WHEREFORE, the City of Portland requests an order authorizing it to intervene as a party in this proceeding.

DATED this 14th day of April, 2006.

Respectfully submitted,

Benjamin Walters

Benjamin Walters, OSB #85354  
Senior Deputy City Attorney  
Of Attorneys for City of Portland

1 CERTIFICATE OF SERVICE

2 I hereby certify that I served a copy of the foregoing PETITION OF CITY OF  
3 PORTLAND TO INTERVENE to:

4 Public Utility Commission of Oregon  
5 Attn: Filing Center  
6 PO Box 2148  
7 Salem OR 97308-2148

8 on the 14th day of April, 2006, by electronic copy to the Case Manager, Judy Johnson, e-mail  
9 address: judy.johnson@state.or.us and by mailing the original and two copies of said document,  
10 contained in a sealed envelope with postage paid, and deposited in the post office at Portland,  
11 Oregon on said day.

12 I further certify that I served a copy of the foregoing PETITION OF CITY OF  
13 PORTLAND TO INTERVENE on the individuals identified on the attached Service List by  
14 electronic mail.

15 DATED this 14th day of April, 2006

16 Benjamin Walters  
17 Benjamin Walters, OSB #85354  
18 Senior Deputy City Attorney  
19 Of Attorneys for City of Portland  
20  
21  
22  
23  
24  
25  
26

## SERVICE LIST

UE 179

KURT J BOEHM  
BOEHM KURTZ & LOWRY  
36 E SEVENTH ST, SUITE 1510  
CINCINNATI OH 45202  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)

JAMES T SELECKY  
BRUBAKER & ASSOCIATES, INC.  
1215 FERN RIDGE PKWY, SUITE 208  
ST. LOUIS MO 63141  
[jtselecky@consultbai.com](mailto:jtselecky@consultbai.com)

LOWREY R. BROWN  
CITIZENS' UTILITY BOARD OF OREGON  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[lowrey@oregoncub.org](mailto:lowrey@oregoncub.org)

MELINDA J. DAVISON  
DAVISON VAN CLEVE PC  
333 SW TAYLOR, SUITE 400  
PORTLAND OR 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

JASON W. JONES  
ASSISTANT ATTORNEY GENERAL  
REGULATED UTILITY & BUSINESS  
SECTION  
DEPARTMENT OF JUSTICE  
1162 COURT ST NE  
SALEM OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

KARL HANS TANNER, PRESIDENT  
OREGON ENERGY COORDINATORS  
ASSOCIATION  
2448 W HARVARD BLVD  
ROSEBURG OR 97470  
[karl.tanner@ucancap.org](mailto:karl.tanner@ucancap.org)

MICHAEL L KURTZ  
BOEHM KURTZ & LOWRY  
36 E SEVENTH ST, SUITE 1510  
CINCINNATI OH 45202  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)

JASON EISDORDER  
CITIZENS' UTILITY BOARD OF OREGON  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[jason@oregoncub.org](mailto:jason@oregoncub.org)

JIM ABRAHAMSON  
COMMUNITY ACTION DIRECTORS OF  
OREGON  
4035 12TH ST CUTOFF SE, SUITE 110  
SALEM OR 97302  
[jim@cado-oregon.org](mailto:jim@cado-oregon.org)

IRION SANGER  
DAVISON VAN CLEVE PC  
333 SW TAYLOR, SUITE 400  
PORTLAND OR 97204  
[ias@dvclaw.com](mailto:ias@dvclaw.com)

MICHAEL T. WEIRICH  
ASSISTANT ATTORNEY GENERAL  
REGULATED UTILITY & BUSINESS  
SECTION  
DEPARTMENT OF JUSTICE  
1162 COURT ST NE  
SALEM OR 97301-4096  
[michael.weirich@state.or.us](mailto:michael.weirich@state.or.us)

LAURA BEANE  
MANAGER, REGULATION  
PACIFICORP  
825 MULTNOMAH, SUITE 800  
PORTLAND OR 97232-2153  
[laura.beane@pacificorp](mailto:laura.beane@pacificorp)

PORTLAND GENERAL ELECTRIC  
RATES & REGULATORY AFFAIRS  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

DOUGLAS C. TINGEY  
PORTLAND GENERAL ELECTRIC  
121 SW SALMON ST 1WTC13  
PORTLAND OR 97204  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

KATHERINE A. MCDOWELL  
STOEL RIVES LLP  
900 SW FIFTH AVE, SUITE 1600  
PORTLAND OR 97204-1268  
[kamcdowell@stoel.com](mailto:kamcdowell@stoel.com)