



CITY OF
PORTLAND, OREGON
OFFICE OF CITY ATTORNEY

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April 12, 2010

Public Utility Commission
Attention: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308

Re: Docket No. UE 215: PGE – Application for a General Rate Increase

Dear Commission:

Enclosed for filing is an original and one copy of the Petition of City of Portland, Oregon to Intervene and to Participate as a Party. The City of Portland also waives paper service. A copy of this document was served on all parties listed on the attached Certificate of Service in this matter.

Very truly yours,

Benjamin Walters
Chief Deputy City Attorney

BW:lw
Enclosures
cc: Service List – UE 215



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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 215

In the Matter of:)
)
PORTLAND GENERAL ELECTRIC)
COMPANY)
)
Application for a general rate increase.)
)
)

PETITION OF CITY OF PORTLAND,
OREGON TO INTERVENE AND TO
PARTICIPATE AS A PARTY

Waiver of Paper Service Requested

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

1. The City of Portland, Oregon, (the "City"), is a municipal corporation duly organized and existing under the laws of the State of Oregon.
2. The business address for the City for the purposes of its participation as a party of record in this proceeding is:

David Tooze, Policy Analyst
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland OR 97209
Fax Number: 503-823-5311
e-mail address: David.Tooze@portlandoregon.gov

3. Correspondence and service of papers related to this proceeding should be presented also upon the City's counsel:

1 Benjamin Walters
2 Chief Deputy City Attorney
3 Office of City Attorney
4 1221 SW 4th Ave, Suite 430
5 Portland, OR 97204
6 Fax Number: 503-823-3089
7 e-mail address: ben.walters@portlandoregon.gov

8 4. The City of Portland has a substantial interest in the application submitted by
9 Portland General Electric Company ("PGE") for a general rate increase. PGE's proposed rate
10 increases would have substantial and direct economic impacts upon the City of Portland's
11 bureaus and agencies as PGE customers, as well as the citizens of Portland as PGE ratepayers.
12 This matter is of vital significance to the City of Portland.

13 5. In regard to PGE, the City is centrally concerned with the outcome of this
14 proceeding and its potential effect on utility management, electricity rates and service.

15 (a) PGE is one of two private electric utilities serving customers within the
16 City of Portland's geographical boundaries. PGE provides electricity services, utility
17 management, and related services to the citizens of Portland. Under authority of its city charter
18 and state law, the City of Portland has the authority and responsibility to look after the interests
19 of its citizens in public utility matters. The City of Portland has an interest in the potential
20 economic impacts of the proposed rate increases upon residential and commercial electricity
21 customers within the City of Portland;

22 (b) The City is one of PGE's larger utility customers, with over 870 accounts
23 having a total of approximately \$14,000,000 in combined annual PGE utility billings. The City
24 of Portland has an obligation to keep its electricity expenditures low, to minimize costs for local
25 taxpayers as well as its own water and sewer utility ratepayers; and

26 (c) The City and PGE have a long, well-established relationship of working
cooperatively to promote energy efficiency, renewable energy and sustainable environmental
actions, including energy-efficiency services for homeowners and businesses; promotion of

1 clean, renewable energy resources; weatherization and bill-paying assistance services for lower
2 income households; and opportunities for on-bill payments of loans for weatherization and
3 renewable energy projects.

4 6. The City of Portland has knowledge and expertise that can assist the Commission
5 in reviewing PGE's request.

6 7. As an intervenor in this proceeding, the City of Portland will address such issues
7 as it deems relevant to its interests, including issues that it identifies itself within the time set for
8 such action and issues identified by others that may affect City of Portland's interests.

9 8. The City of Portland's appearance and participation will not unreasonably broaden
10 the issues, burden the record, or otherwise unduly delay this proceeding.

11 THEREFORE, the City of Portland respectfully requests an order from the Commission
12 authorizing it to intervene as a party in this proceeding.

13 Dated this 8th day of April, 2010.

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Respectfully submitted,

Benjamin Walters

Benjamin Walters, OSB #853546
Chief Deputy City Attorney
Attorneys for City of Portland

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITION OF CITY OF PORTLAND,
OREGON TO INTERVENE AND TO PARTICIPATE AS A PARTY on the attached service
list for Docket No. UE 215, on this 8th day of April, 2010.

Benjamin Walters

Benjamin Walters, OSB #853546
Chief Deputy City Attorney
Attorneys for City of Portland

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