

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 262

In the Matter of  
Portland General Electric Company:  
Request for General Rate Revision

PETITION TO INTERVENE OF CITY OF  
PORTLAND AND WAIVER OF PAPER  
SERVICE

City of Portland, Oregon petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: David Tooze, Policy Analyst  
Company: City of Portland, Oregon  
Bureau of Planning & Sustainability  
1900 SW 4<sup>th</sup> Ave, Room 7100  
City, State, Zip: Portland, OR 97201  
Email Address: david.tooze@portlandoregon.gov  
Telephone: 503-823-7582

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

Name: Benjamin Walters  
Company: City of Portland, Oregon  
Street Address: 1221 SW 4<sup>th</sup> Ave, Room 430  
City, State, Zip: Portland, OR 97204  
Email Address: ben.walters@portlandoregon.gov  
Telephone: 503-823-4047

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The City of Portland is a municipal corporation duly organized and existing under the laws of the State of Oregon. The City has charter and statutory authority to franchise utilities for orderly management of the streets, and to adopt taxes. The City of Portland is a large electricity customer with a significant number of accounts and annual utility billings. As a corporate customer and local government body, the City strives to balance the goals of economical electricity rates, while maintaining stable general revenue funding to support municipal services.

4. The nature and extent of the Petitioner's interest in the proceeding is:

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

5. The issues the Petitioner intends to raise at the proceeding are:

The City is centrally concerned with the outcome of this proceeding and its potential effect on utility management, electricity rates and service.

- (a) The City is one of PGE's larger utility customers, with over 900 accounts having a total of approximately \$13,500,000 in combined annual PGE utility billings; and
  - (b) The City of Portland has an interest in the potential economic impacts of the proposed rate increases upon residential and commercial electricity customers within the City of Portland.
6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:
- The City of Portland has participated as a party in numerous dockets and matters before the Commission. The City of Portland brings a unique perspective to the issues in this proceeding.
7. Based on the information provided above in accordance with the Commission's rules of procedure, the City requests to participate in this proceeding as an intervenor. The City will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Benjamin Walters  
Benjamin Walters, Chief Deputy City Attorney  
Petitioner's Representative

March 27, 2013  
Date Signed

## UE 262 – Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITION TO INTERVENE OF CITY OF PORTLAND, OREGON AND WAIVER OF PAPER SERVICE to the parties listed on the attached service list for Docket No. UE 262, on this 27<sup>th</sup> day of March, 2013, by electronic email.

/s/ Benjamin Walters

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