

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

In the Matter of)	Docket No. UE 267
PacifiCorp, dba Pacific Power)	
)	PETITION TO INTERVENE
)	AND COMMENTS
Transition Adjustment, Five-Year Cost of Service)	
Opt-Out)	

**PETITION TO INTERVENE AND COMMENTS IN SUPPORT OF STIPULATION
OF THE COMPETE COALITION**

I. Petition To Intervene

Pursuant to ORS § 756.525 and OAR 860-001-0300, the COMPETE Coalition (“COMPETE”) hereby respectfully petitions the Public Utility Commission of Oregon (“Commission”) for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

COMPETE
Attn: William L. Massey
Counsel to COMPETE
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 662-5322
Fax: (202) 778-5322
wmassey@cov.com

2. This Intervenor, COMPETE, will be represented in this docket by:

William L. Massey
Counsel to COMPETE
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 662-5322
Fax: (202) 778-5322
wmassey@cov.com

Irion Sanger
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the following:

William L. Massey
Counsel to COMPETE
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 662-5322
Fax: (202) 778-5322
wmassey@cov.com

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1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
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4. This Intervenor, COMPETE, is a not-for-profit entity, a coalition of 765 diverse electricity stakeholders, including customers, suppliers, traditional and clean energy generators, transmission owners, trade associations, technology innovators, environmental organizations and economic development corporations – all of whom support well-structured competitive electricity markets for the economic and environmental benefit of consumers. Thirty-nine COMPETE members have 779 facilities in Oregon, and therefore have a direct and substantial interest in this proceeding, and as consumers and suppliers of electricity will be affected by the outcome.

5. This Intervenor intends to participate herein as a party.

6. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding, which may have a material impact on the business activities of its members in the State of Oregon.

7. Under Oregon law, the Commission “shall grant” a petition to intervene before the final taking of evidence in a proceeding if the appearance and participation will not unreasonably broaden the issues, burden the record, or delay the proceeding. ORS § 756.525; OAR 860-001-0300. The final taking of evidence has not occurred in this proceeding and the record has not yet been closed. Granting this Intervenor’s petition to intervene will not broaden the issues, burden the record or delay the proceedings. Intervenor’s sole purpose is to express support for the Stipulation. Intervenor takes the record and schedule of this proceeding as it is.

WHEREFORE, COMPETE respectfully requests that the Commission grant its Petition to Intervene in this proceeding.

II. Comments in Support of Stipulation

The Commission’s staff and nine intervenors in this proceeding representing ratepayers, industrial and commercial customers, independent power suppliers and retail energy service suppliers, on October 14, 2013 filed a stipulation presenting a comprehensive set of terms for PacifiCorp’s opt-out program (“Stipulation”).¹ For the reasons stated below, COMPETE respectfully recommends that the Commission adopt the Stipulation.

¹ A corrected version of the Stipulation was filed on October 21, 2013.

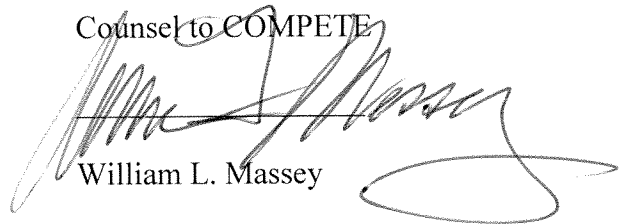
COMPETE has participated in Commission proceedings significantly related to this proceeding. COMPETE provided a detailed description of the benefits of competitive electricity markets and supporting data in its comments submitted in advance of the Commission's April 11, 2012 workshop regarding generic issues relating to direct access in Docket No. UE 236. COMPETE also was granted intervention in Docket No. UM 1587 proceeding, which resulted in the Commission's directing PacifiCorp to file the five-year opt-out proposal for allowing customers to transition to direct access to electric service suppliers that is under consideration in the instant proceeding.

We understand that the purpose of the Commission's directive was to eliminate the differences between the retail access programs of PacifiCorp and Portland General Electric Company ("PGE"), and to require PacifiCorp to file a five-year opt-out program similar to PGE's.

The Stipulation addresses significant problems with PacifiCorp's proposal in this proceeding to bring it more in line with PGE's direct access program, and thus make it more consumer and competition friendly. Accordingly, COMPETE respectfully recommends that the Commission adopt the Stipulation.

DATED this 17th day of June, 2014.

Counsel to COMPETE



William L. Massey

1201 Pennsylvania Ave., NW
Washington, DC 20004
202-662-5322
wmassey@cov.com

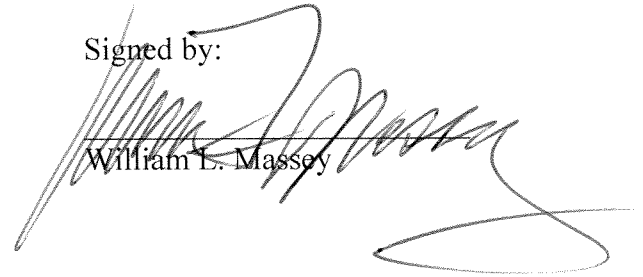
Irion Sanger
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused PETITION TO INTERVENE AND COMMENTS to be served by electronic mail to those parties whose email addresses appear on the attached service list from OPUC Docket No. UE 267.

Dated at Washington, DC, this 17th day of June, 2014.

Signed by:



William L. Massey



eDockets

Docket Summary

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Docket No: UE 267 **Docket Name:** PACIFIC POWER

[Print Summary](#)

Subject Company: [PACIFIC POWER](#)

In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out. Filed by William R. Griffith. Hard copy rec'd 2/28/13. (See initial utility filing for electronic version.)

Filing Date: 2/28/2013

Advice No: 13-004

Effective: 1/1/2015

Expiration: 12/31/2014

Status: **SUSPENDED**

Case Manager: MARC HELLMAN

Phone: (503) 378-6355

Email: marc.hellman@state.or.us

Law Judge: TRACI KIRKPATRICK

Phone: (503) 378-6683

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W=Waive Paper service	C=Confidential HC=Highly Confidential	Sort by Last Name	Sort by Company Name
W	CARL FINK	628 SW CHESTNUT ST, STE 200 PORTLAND OR 97219 cmfink@blueplanetlaw.com	
W	EDWARD FINKLEA EXECUTIVE DIRECTIOR	326 FIFTH ST LAKE OSWEGO OR 97034 efinklea@nwigu.org	
W	BOEHM KURTZ & LOWRY KURT J BOEHM (C) ATTORNEY	36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com	
W	BOEHM, KURTZ & LOWRY JODY KYLER COHN (C) ATTORNEY	36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkyler@bkllawfirm.com	
W	CABLE HUSTON BENEDICT ET AL THOMAS M GRIM (C) ATTORNEY	1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 tgrim@cablehuston.com	
W	CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP RICHARD LORENZ (C)	1001 SW FIFTH AVE - STE 2000 PORTLAND OR 97204-1136 rlorenz@cablehuston.com	
W	CONSTELLATION ENERGY		

	COMMODITIES GROUP, INC.	
	MARY LYNCH	5074 NAWAL DRIVE EL DORADO HILLS CA 95762 mary.lynch@constellation.com
W	CONSTELLATION NEWENERGY, INC.	
	JOHN DOMAGALSKI	550 WEST WASHINGTON BLVD, STE 300 CHICAGO IL 60661 john.domagalski@constellation.com
W	DAVISON VAN CLEVE	
	JOSHUA D WEBER	333 SW TAYLOR STE 400 PORTLAND OR 97204 jdw@dvclaw.com
W	DAVISON VAN CLEVE PC	
	S BRADLEY VAN CLEVE (C)	333 SW TAYLOR - STE 400 PORTLAND OR 97204 bvc@dvclaw.com
W	ENERGY STRATEGIES LLC	
	KEVIN HIGGINS (C) PRINCIPAL	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com
W	EXELON BUSINESS SERVICES COMPANY	
	CYNTHIA FONNER BRADY ASSISTANT GENERAL COUNSEL	4300 WINFIELD RD WARRENVILLE IL 60555 cynthia.brady@constellation.com
W	FRED MEYER STORES/KROGER	
	NONA SOLTERO CORPORATE LAW DEPT #23C	3800 SE 22ND AVE PORTLAND OR 97202 nona.soltero@fredmeyer.com
W	HUTCHINSON COX COONS ORR & SHERLOCK	
	SAMUEL L ROBERTS (C) ATTORNEY	777 HIGH ST STE 200 PO BOX 10886 EUGENE OR 97440 sroberts@eugenelaw.com
W	MCDOWELL RACKNER & GIBSON PC	
	KATHERINE A MCDOWELL (C) ATTORNEY	419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 katherine@mcd-law.com
W	MCKENNA LONG & ALDRIDGE LLP	
	STEFANIE WARREN	600 W BROADWAY STE 2600 SAN DIEGO CA 92101 swarren@mckennalong.com
W	MOUNTAIN WEST ANALYTICS	
	BRADLEY MULLINS (C)	333 SW TAYLOR STE 400

		PORTLAND OR 97204 brmullins@mwanalytics.com
W	NOBLE AMERICAS ENERGY SOLUTIONS, LLC	
	GREG BASS DIRECTOR- REGULATORY	401 WEST A ST., STE. 500 SAN DIEGO CA 92101 gbass@noblesolutions.com
W	NW & INTERMOUNTAIN POWER PRODUCERS COALITION	
	ROBERT D KAHN EXECUTIVE DIRECTOR	PO BOX 504 MERCER ISLAND WA 98040 rkahn@nippc.org
W	PACIFIC POWER & LIGHT	
	JOELLE STEWARD (C) REGULATORY MANAGER	825 NE MULTNOMAH STE 2000 PORTLAND OR 97232 joelle.steward@pacificcorp.com
W	PACIFICORP, DBA PACIFIC POWER	
	OREGON DOCKETS	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
W	PORTLAND GENERAL ELECTRIC	
	DOUGLAS C TINGEY	121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com
	JAY TINKER	121 SW SALMON ST 1WTC-0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
W	PUBLIC UTILITY COMMISSION OF OREGON	
	MARC HELLMAN (C)	PO BOX 1088 SALEM OR 97308-1088 marc.hellman@state.or.us
W	PUC STAFF - DEPARTMENT OF JUSTICE	
	JOHANNA RIEMENSCHNEIDER (C)	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4796 johanna.riemenschneider@doj.state.or.us
W	RICHARDSON ADAMS, PLLC	
	GREGORY M. ADAMS (C)	PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com
W	SAFEWAY INC	
	LISSA MALDONADO	5918 STONERIDGE MALL ROAD PLEASANTON CA 94588-3229 lissa.maldonado@safeway.com
	GEORGE WAIDELICH	5918 STONERIDGE MALL RD PLEASANTON OR 94588-3229

george.waidelich@safeway.com

W SHELL ENERGY

JOHN LESLIE

600 WEST BROADWAY SUITE 2600
SAN DIEGO CA 92101
jleslie@mckennalong.com

W SHELL ENERGY NORTH AMERICA

MARCIE MILNER

4445 EASTGATE MALL STE 100
SAN DIEGO CA 92121
marcie.milner@shell.com

W WAL-MART STORES, INC.

STEVE W CHRISS (C)

2001 SE 10TH ST
BENTONVILLE AR 72716-0550
stephen.chriss@wal-mart.com

W WALMART STORES INC

KEN BAKER

2001 SE 10TH ST
BENTONVILLE AR 72716
ken.baker@wal-mart.com