



**Cleantech Law Partners, PC**

548 Market Street, Suite 59966  
San Francisco, CA 94104  
www.cleantechlawpartners.com  
866.233.8064

March 26, 2015

Public Utilities Commission of Oregon  
Filing Center  
POB 2148  
Salem, OR 97308  
Puc.filingcenter@state.or.us

RE: OPUC Docket UE 294 Portland General Electric General Rate Case

Attention Filing Center:

Enclosed for filing in the above-referenced docket is Small Business Utility Advocates ("SBUA") Petition to Intervene. Please use the following mailing address for SBUA's counsel:

Cleantech Law Partners  
420 SW Washington St. Ste 400  
Portland, OR 97204

As per the February 5, 2015 Memorandum in this docket, at this point, included in the Huddle for SBUA would be SBUA's counsel, e-mail: [dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com).

As stated in the Petition to Intervene, service is requested for James Birkelund, SBUA President, and please include Mr. Birkelund, e-mail: [james@utilityadvocates.org](mailto:james@utilityadvocates.org), in the Huddle for non-confidential information in this docket.

Please contact me at [dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com) or 541-270-6001 if you have any questions. Thank you for your assistance in this matter.

Sincerely,

/s/ Diane Henkels

Diane Henkels,  
Cleantech Law Partners  
Counsel for SBUA

Enclosure

Cc: James Birkelund

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 294**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	SMALL BUSINESS UTILITY
OREGON	)	ADVOCATES' PETITION TO
	)	INTERVENE
Portland General Electric General Rate Case	)	
_____	)	

Pursuant to ORS 756.525, and OAR 860-001-0300, and the March 6, 2015 Prehearing Conference Memorandum in this docket, Small Business Utility Advocates, hereinafter “SBUA”, petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

1. The contact information for Petitioner to be included on the service list is:

James Birkelund  
SBUA  
548 Market Street, Ste 11200  
San Francisco, CA 94104  
[james@utilityadvocates.org](mailto:james@utilityadvocates.org)

2. SBUA is a nonprofit organization that represents, protects, and promotes the interests of small business utility customers. SBUA is a nonprofit entity, formed in 2012, which has currently approximately 200 members, of which several are Oregon-based entities, and including the membership includes at least one member organization with several members which have done business in Oregon. SBUA endeavors to provide information and assistance with regard to utility conservation measures available to small business, notify the small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provide advice to small businesses with respect to utility service. The nature and extent of SBUA’s interest in this docket includes representation

and advocacy for small business where smaller commercial rate-payers pay different rates than residential or large commercial rate-payers.

3. Issues SBUA intends to raise pertain to maintaining rate pricing that is reasonable for smaller businesses including articulating impacts on small business of rate pricing changes.

4. Special knowledge or expertise SBUA contributes to the docket includes legal counsel which regularly advises small businesses in various matters including utility related issues. SBUA's counsel in Oregon provides legal services for a wide variety of businesses in Oregon in Portland General Electric and other investor owned utility territories. Also, counsel has experience in utility regulatory matters generally including advising residential and small business clients in rate-making in electricity and water-related matters.

5. SBUA'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.

6. SBUA will be represented in this matter by the following:

Diane Henkels  
Of Counsel, Cleantech Law Partners PC  
420 SW Washington St. Ste 400 Portland, OR 97204  
Tel: 541-270-6001  
[dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com)

7. SBUA requests to be added to the service list in this docket at the address set forth above.

8. SBUA hereby waives paper service in this docket.

RESPECTFULLY SUBMITTED March 26, 2015.

/s/ Diane Henkels

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Diane Henkels  
Of Counsel, Cleantech Law Partners PC  
Counsel for Small Business Utility Advocates

## CERTIFICATE OF FILING SERVICE

I hereby certify that on March 26, 2015, I filed the original and one copy of Small Business Utility Advocates’ Petition to Intervene in UE 294 Portland General Electric General Rate Revision by electronic mail unless otherwise noted. “W” denotes waiver of paper service; “C” denotes those receiving confidential information.

<p>CITIZENS’ UTILITY BOARD OF OREGON—W            OPUC DOCKETS 610 SW BROADWAY, STE 400            PORTLAND OR 97205  <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a></p>	<p>ENERGY STRATEGIES LLC—W, C            KEVIN HIGGINS 215 STATE ST STE 200            SALT LAKE CITY UT 84111-2322  <a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a></p>
<p>W SOMMER TEMPLET—W, C            610 SW BROADWAY, STE. 400            PORTLAND OR 97205  <a href="mailto:sommer@oregoncub.org">sommer@oregoncub.org</a></p>	<p>MOUNTAIN WEST ANALYTICS            BRADLEY MULLINS—W, C            333 SW TAYLOR STE 400            PORTLAND OR 97204  <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a></p>
<p>DAVISON VAN CLEVE PC            S BRADLEY VAN CLEVE—W, C            TYLER C PEPPE—W, C            333 SW TAYLOR STE 400            PORTLAND OR 97204  <a href="mailto:bvc@dvclaw.com">bvc@dvclaw.com</a>  <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a></p>	<p>NOBLE AMERICAS ENERGY SOLUTIONS, LLC            GREG BASS—W            401 WEST A ST., STE. 500            SAN DIEGO CA 92101  <a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a></p>
<p>RICHARDSON ADAMS, PLLC            PETER J RICHARDSON—W            GREGORY ADAMS—W            PO BOX 721\$            BOISE ID 83707  <a href="mailto:pcter@richardsonadams.com">pcter@richardsonadams.com</a>  <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a></p>	<p>PACIFICORP, DBA PACIFIC POWER            OREGON DOCKETS—W            825 NE MULTNOMAH ST, STE 2000            PORTLAND OR 97232  <a href="mailto:oregondockets@pacificcorp.com">oregondockets@pacificcorp.com</a></p>
<p>NW ENERGY COALITION            WENDY GERLITZ—W            1205 SE FLAVEL            PORTLAND OR 97202  <a href="mailto:wendy@nwenergy.org">wendy@nwenergy.org</a></p>	<p>PORTLAND GENERAL ELECTRIC            DOUGLAS C TINGEY—W, C            121 SW SALMON IWTCI3OI            PORTLAND OR 97204  <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a></p>

<p>PORTLAND GENERAL ELECTRIC  JAY TINKER – W, C  121 SW SALMON ST 1WTC-0702  PORTLAND OR 97204  <a href="mailto:pge.opuc.fhings@pgn.com">pge.opuc.fhings@pgn.com</a></p>	<p>PACIFIC POWER  SARAH WALLACE – W, C  825 NE MULTNOMAH ST STE 1800  Portland, OR  <a href="mailto:sarah.wallace@pacificcorp.com">sarah.wallace@pacificcorp.com</a></p>
<p>PUBLIC UTILITY COMMISSION OF OREGON  JUDY JOHNSON – W, C  PO BOX 1088 SALEM OR 97308-1088  <a href="mailto:judy.johnson@state.or.us">judy.johnson@state.or.us</a></p>	<p>PUC STAFF DEPARTMENT OF JUSTICE  JOHANNA BUSINESS ACTIVITIES SECTION  RIEMENSCHNEIDER – W, C  1162 COURT ST NE  SALEM OR 9730 1-4796  <a href="mailto:johanna.riemenschneider@doj.State.or.us">johanna.riemenschneider@doj.State.or.us</a></p>
	<p>Kurt J. Boehm, Esq. Date  Jody Kyler Cohn, Esq.  BOEHM, KURTZ &amp; LOWRY  36 East Seventh Street, Suite 1510  Cincinnati, Ohio 45202  kboehm@BKLawfirm.com  <a href="mailto:jkylercohn@BKLawfirm.com">jkylercohn@BKLawfirm.com</a></p>

Dated: March 26, 2015.

/s/ Diane Henkels

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Diane Henkels, Attorney at Law  
Cleantech Law Partners, PC  
Attorneys for SBUA