

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 352

In the Matter of	)	
	)	PETITION TO INTERVENE OF SMALL
PACIFICORP, dba PACIFIC POWER	)	BUSINESS UTILITY ADVOCATES
	)	
2019 Renewable Adjustment Clause	)	
_____	)	

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Small Business Utility Advocates, (“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, Suite 11200  
San Francisco, CA 94104  
james@utilityadvocates.org

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

Diane Henkels, Attorney  
SBUA  
621 SW Morrison St. Ste 1025  
Portland, OR 97205  
Tel: 541.270.6001  
diane@utilityadvocates.org

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William Steele  
Bill Steele and Associates, LLC  
P.O. Box 631151  
Highlands Ranch, CO 80164  
Tel: (303)-921-3808  
wa.steele@hotmail.com

3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has approximately 200 members, of which many are Oregon-based entities. Many Oregon SBUA members are customers of PacifiCorp dba Pacific Power (“Company”). SBUA provides information and assistance to small business with regard to utility matters. SBUA represents small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provides advice to small businesses with respect to utility service. The nature and extent of SBUA’s interest in this docket includes examining the Company’s plan to repower wind turbines to increase power production, and the rate increase the Company proposes for small nonresidential customers for fairness and reasonableness.

4. SBUA has special knowledge and expertise to contribute to this docket from the perspective of small firms in the State of Oregon. SBUA and its legal counsel have substantial expertise working with and representing small business generally, and significant experience in utility regulatory matters, including representing and advising small business in ratemaking and other utility regulatory matters. SBUA’s expert is a seasoned consultant, former utility commission staff, and regular instructor for electric utility ratemaking seminars.

5. SBUA has a direct and substantial interest in this proceeding that is not represented by any other party, and will be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow SBUA to intervene in this proceeding. SBUA's intervention 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 per the Administrative Law Judge's Prehearing Conference Memorandum issued February 14, 2019.

6. SBUA requests the addresses above be added to the service list.

RESPECTFULLY SUBMITTED February 14, 2019



s/ Diane Henkels

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Diane Henkels  
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