# Davison Van Cleve PC

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April 8, 2019

# Via Electronic Filing

Public Utility Commission of Oregon Attn: Filing Center 201 High St. SE, Suite 100 Salem OR 97301

#### In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Re: 2020 Annual Power Cost Update Tariff Docket No. UE 359

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Petition to Intervene in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch Jesse O. Gorsuch

Enclosure

## **BEFORE THE PUBLIC UTILITY COMMISSION**

### **OF OREGON**

#### **UE 359**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	ALLIANCE OF WESTERN ENERGY
COMPANY,	)	CONSUMERS
	)	
2020 Annual Power Cost Update Tariff.	)	
	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Alliance of Western

Energy Consumers ("AWEC") hereby petitions the Oregon Public Utility Commission

("Commission") to intervene in this proceeding with full party status as described in OAR § 860-

001-0010(7). In support of this petition, AWEC represents as follows:

1. The business address of AWEC is:

Alliance of Western Energy Consumers 818 SW 3rd Ave., #266 Portland, OR 97204

2. AWEC will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to these proceedings should be served on AWEC's attorneys and

consultant at the following addresses:

Tyler C. Pepple Davison Van Cleve, P.C. 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Bradley G. Mullins 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 E-Mail: brmullins@mwanalytics.com Telephone: (503) 954-2852 Facsimile: (503) 241-8160

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Riley G. Peck Davison Van Cleve, P.C. 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 E-Mail: rgp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. A list of AWEC members is included as Attachment A. Many members of AWEC are customers of Portland General Electric Company ("PGE" or the "Company"), as indicated on Attachment A.

4. On April 1, 2019, PGE filed its Annual Power Cost Update Tariff ("AUT"), the purpose of which is to update PGE's net power costs and to establish transition credits or charges for direct access customers. Any adjustment to how such costs are passed along to customers will substantially and directly affect those of AWEC's members who purchase power from PGE. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PGE's rates and programs.

5. AWEC represents the interests of a number of large customers served by PGE in Oregon. AWEC also has significant experience participating in proceedings involving PGE's AUT filings. AWEC'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. As described above, AWEC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by

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any Commission determination made in connection with this proceeding. It is in the public

interest to allow AWEC to intervene in this proceeding.

WHEREFORE, AWEC respectfully requests that the Commission grant its

petition to intervene with full party status in this proceeding.

Dated this 8th day of April, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/Tyler C. Pepple</u> Tyler C. Pepple 1750 SW Harbor Way, Suite 450 Portland, Oregon 97201 (503) 241-7242 phone (503) 241-8160 facsimile tcp@dvclaw.com Of Attorneys for the Alliance of Western Energy Consumers

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# ATTACHMENT A MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Liquide Air Products AkzoNobel Alcoa **Amcor Rigid Plastics** Axiall, Inc. **Basic American Foods** \*Boeing \*Boise Cascade, Inc. **BYU** Idaho **Columbia Steel** \*Darigold Dyno Nobel, Inc. **Emerald Performance Materials** \*Evraz, Inc. Freres Lumber Co. Georgia-Pacific Idahoan Foods Inland Empire Paper Co. \*Intel Corp \*International Paper Johnson Controls, Inc. \*JR Simplot Kaiser Aluminum Trentwood Facility Kapstone Kraft Paper Lamb Weston \*Legacy Health Microsoft Corporation Nippon Dynawave Packaging Co. \*Norpac Foods North Pacific Paper Co. Northwest Hardwoods NW Innovation Works On Semiconductor \*Oregon Health Sciences University \*Packaging Corporation of America Pendleton Ponderay Newsprint \*Precision Castparts **REC Solar Grade Silicon LLC** \*Schnitzer Steel Shell Oil Products US

Solvay Chemicals Supreme Perlite Co. Swanson Group Tesoro Refining and Marketing Co. Timber Products United States Gypsum Co. University of Oregon Wah Chang \*WestRock Weyerhaeuser NR Co.

\*Denotes PGE Customers