BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

	UE 390	
In the Matter of)	
PACIFICORP 2022)	PETITION TO INTERVENE OF SMALL
TRANSITION ADJUSTMENT)	BUSINESS UTILITY ADVOCATES
MECHANISM)	
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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

- 3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has over 200 members, of which many are Oregon-based entities. Many Oregon SBUA members are customers of PacifiCorp d/b/a 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 and other public bodies, educates and provides advice to small businesses with respect to utility service. SBUA's interest in this docket is ensuring that small commercial customers, generally known as Schedule 23, are ensured fair and reasonable rates. SBUA may also focus on other topics relevant to this docket and related to fair and reasonable rates and terms and conditions.
- 4. SBUA has special knowledge and expertise to contribute to this docket having represented and continuing to represent small commercial ratepayers in UE 374 PacifiCorp's General Rate Revision docket. SBUA and its legal counsel and SBUA's expert in this matter, Steele and Associates ("Steele"), 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. In the past several years, SBUA has intervened in various dockets regarding PacifiCorp d/b/a Pacific Power.
- 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. No other party represents exclusively the small nonresidential ratepayers, a numerous class of ratepayers. It is in the public interest to allow SBUA to intervene UE 390 PETITION TO INTERVENE OF SMALL BUSINESS UTILITY ADVOCATES 2

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.

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

RESPECTFULLY SUBMITTED April 7, 2020



s/ Diane Henkels

Diane Henkels
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