

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 394

In the Matter of	)	
	)	
PORTLAND GENERAL	)	PETITION TO INTERVENE OF SMALL
ELECTRIC Request for	)	BUSINESS UTILITY ADVOCATES
General Rate Revision	)	
	)	

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, and many of the Oregon SBUA members are customers of Portland General Electric (“PGE”). 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 rates and service. SBUA’s interest in this docket is ensuring that small business with most focus on PGE’s small commercial customers, generally known as Schedule 32, are ensured fair and reasonable rates.

4. SBUA has special knowledge and expertise to contribute to this docket. SBUA represented small commercial customers in other PGE dockets including UE 294 PGE Request for General Rate Revision providing testimony and participating fully in briefing, UE 319 PGE Request for General Rate Revision participating in a more limited role, and the recent COVID-19 related proceedings related to UM 2114. SBUA and its legal counsel and SBUA’s expert in this matter, William A. 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. SBUA recently represented small commercial customers in another utility’s rate case, UE 374 PacifiCorp dba Pacific Power Request for General Rate Revision, and has focused since the closing of the Record in that docket on rate spread and rate design, issues particularly pertinent to this docket at this stage.

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

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connection with this proceeding. If the Commission accepts the Stipulation proposed by the existing parties, outstanding issues such as rate spread and rate design will impact small commercial customers. No other party represents exclusively these ratepayers and Schedule 32 is the second most numerous class of ratepayers after residential Schedule 7. 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, SBUA does not oppose the proposed Partial Stipulation filed in this docket on September 30, 2021, and this intervention 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 October 14, 2021.



s/ Diane Henkels

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Diane Henkels  
Attorney, Small Business Utility Advocates  
[www.utilityadvocates.org](http://www.utilityadvocates.org)  
621 SW Morrison St. Ste 1025  
Portland, OR 97205  
541-270-6001  
[diane@utilityadvocates.org](mailto:diane@utilityadvocates.org)