Davison Van Cleve PC

Attorneys at Law

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August 5, 2021

Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,

2020 Annual Power Cost Variance Mechanism.

Docket No. UE 395

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 395

In the Matter of)
PORTLAND GENERAL ELECTRIC COMPANY,	PETITION TO INTERVENE OF THEALLIANCE OF WESTERN ENERGYCONSUMERS
2020 Annual Power Cost Variance Mechanism.)) _)

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:

> The business address of AWEC is: 1.

> > 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. ("DVC"). All documents relating to this proceeding should be served on AWEC's attorneys and DVC's paralegal at the following addresses:

> Tyler C. Pepple Jesse O. Gorsuch Davison Van Cleve, P.C. Davison Van Cleve, P.C. 1750 SW Harbor Way, Ste. 450 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 Portland, OR 97201 E-Mail: tcp@dvclaw.com E-Mail: jog@dvclaw.com Telephone: (503) 241-7242

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Attorney for AWEC Paralegal for DVC

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Attorney for AWEC

3. AWEC is an incorporated, non-profit association of large energy

consumers in the Western United States, with offices in Portland, Oregon. Many members of

AWEC are customers of Portland General Electric Company ("PGE" or the "Company").

4. On June 29, 2021, PGE filed testimony associated with its 2020 Annual

Power Cost Variance Mechanism ("PCAM"). According to PGE, the Annual Variance of \$13.7

million is within the power cost deadbands. Put another way, actual power costs are lower than

forecasted power costs. Therefore, the 2020 Power Cost Variance and deferral are zero. AWEC

requests leave to intervene in this Docket to represent its members who are affected by any

change in their service as an outcome of this proceeding.

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 rates and programs. 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

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

interest to allow AWEC to intervene in this proceeding.

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Telephone (503) 241-7242

WHEREFORE, AWEC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 5th day of August, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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