

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 416

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 President  
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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3. SBUA is a nonprofit 501(c)(3) organization that represents, protects and promotes the interests of small business utility customers. SBUA has many Oregon-based members that are customers of Portland General Electric Company (“PGE” or “Company”). SBUA represents the small business community generally regarding proceedings before utility commissions and other public bodies, and educates small businesses, government, and other entities regarding electric utility rates and terms of service. SBUA’s interest in this docket is ensuring that the Company’s small commercial customers, and in particular those customers taking service under Rate Schedule 32, will receive fair and reasonable rates and terms of service from this ratemaking process and resulting rates.

4. SBUA has special knowledge and expertise to contribute to this docket. Specifically, SBUA has represented the interests of Schedule 32 customers in previous dockets regarding the Company’s requests for rate changes in UE 394 PGE Request for General Rate revision (2021), and UE 294 PGE Request for General Rate Revision (2015) providing testimony and participating fully in briefing, and more limited participation in the UE 319 PGE Request for General Rate Revision (2017). SBUA recently represented small commercial customers in another electric utility rate case that came before the Commission, UE 399 PacifiCorp dba Pacific Power Request for a General Rate Revision. SBUA legal counsel has substantial expertise working with and representing small business generally and in dockets before the Commission. SBUA experts, including former utility commission financial analyst professionals, have significant experience in utility regulatory matters

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 where Schedule 32 customers is an important customer class, the second most numerous ratepayer class in the Company's service territory<sup>1</sup>. SBUA intends to be present for the March 8, 2023 Prehearing Conference as set in Administrative Law Judge Lackey's February 24, 2023 Notice of Prehearing Conference. SBUA's intervention will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. SBUA requests the two addresses above and the address of Guillermo Castillo, guillermo@utilityadvocates.org be added to the service list.

RESPECTFULLY SUBMITTED March 6th, 2023.



s/ Diane Henkels

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Diane Henkels  
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<sup>1</sup> UE 416 PGE Request for a General Rate Revision 416/PGE/1304 Mcfarlane-Pleasant/10  
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