

# Davison Van Cleve PC

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December 5, 2023

## *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 PACIFICORP, dba PACIFIC POWER,  
Advice No. 23-018 (ADV 1545), Modifications to Rule 4,  
Application for Electrical Service.  
**Docket No. UE 428**

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 428**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER, )  
 )  
Advice No. 23-018 (ADV 1545), )  
Modifications to Rule 4, Application for )  
Electrical Service. )

PETITION TO INTERVENE OF THE  
ALLIANCE OF WESTERN ENERGY  
CONSUMERS

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.

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

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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 PacifiCorp (or “Company”).

4. On October 24, 2023, PacifiCorp filed its Advice No. 23-018 to modify Rule 4, Application for Electric Service, which would amend the tariff sheet to include a clause for “Limitation of Liability.” PacifiCorp claims these revisions will ensure reasonable rates and that limitation of liability provisions are an inherent part of the ratemaking process. If approved, PacifiCorp’s requested revisions in Advice No. 23-018 could substantially and directly affect those of AWEC’s members who purchase power from PacifiCorp. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp’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.

PAGE 2 – PETITION TO INTERVENE OF AWEC

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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.

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

Dated this 5th day of December, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

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