

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 433

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Advice Filing No. 24-001,
PacifiCorp's Request for General Rate
Revision

**PETITION TO INTERVENE OF
AMAZON DATA SERVICES, INC.**

Pursuant to ORS § 756.525 and OAR § 860-001-0300, Amazon Data Services, Inc. (“ADS”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding for the purpose of accessing the non-confidential work papers and discovery materials associated with this proceeding. In support of this petition, ADS provides the following information:

1. The business address and contact information of ADS is:

Amazon Data Services, Inc.
ATTN: William Friedman
410 Terry Avenue North
Seattle, WA 98109
wfried@amazon.com

2. All documents relating to this proceeding should be served on the following persons at the addresses listed below:

Counsel:

Derek D. Green
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
Telephone: (503) 241-2300
derekgreen@dwt.com

Olivier Jamin
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
Telephone: (503) 241-2300
olivierjamin@dwt.com

Petitioner:

Amazon Data Services, Inc.
ATTN: William Friedman
410 Terry Avenue North
Seattle, WA 98109
wfried@amazon.com

3. ADS is a corporation that is wholly owned by Amazon.com, Inc. (“Amazon”). Amazon is the largest corporate purchaser of renewable energy globally. ADS’s operations include large infrastructure facilities that are or will be located within the Oregon service territory of PacifiCorp d/b/a Pacific Power (“PacifiCorp”). As Amazon stays on a path of powering its operations with 100% renewable energy by 2025, ADS is actively evaluating potential future renewable energy projects located within PacifiCorp’s territory as well. ADS is interested in matters before the Commission such as this proceeding that will facilitate or impact the realization of these projects, and previously participated in the Commission’s Docket UE 424 concerning revisions to PacifiCorp’s Line Extension policy.

4. ADS intends to participate in this proceeding to raise and address issues that are of relevance to the operation of its projects. In particular, ADS anticipates addressing certain issues of specific relevance to ADS as a large-load customer, including PacifiCorp’s proposed modifications to the Line Extension Refund policy and establishment of a Customer-Funded Substation Credit, a Capacity Reservation Charge, and an Excess Demand Charge. ADS reserves the right to comment on other proposed changes in PacifiCorp’s filings.

5. ADS has a direct and substantial interest in this proceeding that is not adequately represented by any other party. ADS will not unreasonably broaden the issues, burden the records, or unreasonably delay this proceeding.

CONCLUSION

ADS respectfully requests that the Commission grant its petition to intervene with full party status and otherwise fully participate in the proceeding.

DATED: March 8, 2024

DAVIS WRIGHT TREMAINE LLP

By: s/ Derek D. Green

Derek Green
derekgreen@dwt.com

Attorneys for Amazon Data Services, Inc.