

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 433**

In the Matter of

PACIFICORP dba PACIFIC  
POWER,

Request for a General Rate  
Revision.

PETITION TO INTERVENE OF  
COMMUNITY ENERGY PROJECT,  
COALITION OF COMMUNITIES OF  
COLOR, AND VERDE

Pursuant to ORS § 756.525 and OAR 860-001-0300(2), Community Energy Project Inc. (“CEP”), Coalition of Communities of Color, and VERDE (“Verde”) (collectively, “Petitioners”), hereby respectfully submits this Petition to Intervene to the Public Utility Commission of Oregon (“OPUC” or “Commission”) to appear and participate to the full extent allowed by law in the above-referenced proceeding. In support of this petition, the Petitioners provide the following:

1. The contact information of the Petitioners are as follows:

Name: Nikita Daryanani  
Company: Coalition of Communities of Color  
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Name: Anahi Segovia Rodriguez  
Company: VERDE  
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City, State, Zip: Portland, OR 97218  
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Name: Siraat Younas  
Company: Community Energy Project, Inc.  
Street Address: 2705 E. Burnside, Suite 112  
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Telephone: 971-415-5784

2. The Petitioners will be represented by their attorneys Jessica Bernardini and David Petersen of Tonkon Torp LLP. Their contact information for inclusion in the service list is:

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3. CEP is a non-profit organization located in Portland, Oregon, that provides free services focused on safety, health, and energy efficiency, ranging from community education and supplies to direct home energy upgrades and repairs. CEP serves over 1,500 households each year that are largely low-income; Indigenous, Black, or Latinx; seniors; people with disabilities; and immigrant households. CEP believes that everyone deserves a safe, healthy, energy-efficient home, regardless of income. CEP works with low-income individuals who struggle to pay existing utility bills.

4. Coalition of Communities of Color is a coalition representing the interests of eighteen member non-profit organizations, many based in the Portland, Oregon area. The Coalition addresses the socioeconomic disparities, institutional racism, and inequity of services experienced by their families, children, and communities. The Coalition's members organize their communities for collective action resulting in social change to obtain self-determination, wellness, justice, and prosperity. Energy affordability is one of just several socioeconomic issues that the Coalition actively advocates for.

5. Verde is a regional non-profit organization based in Portland, Oregon, with the mission to build environmental wealth through organizing, advocacy, and social enterprise. Verde works statewide and is rooted in the Cully neighborhood of Portland, a typical environmental justice community facing energy affordability challenges in the state. Verde’s members are largely Indigenous, Black, and Latinx; a majority of Verde’s members are low-income and suffer from disproportionate economic and environmental burdens.

6. Collectively, Petitioners are environmental and equity-focused organizations that work directly with marginalized communities experiencing the economic burden of electricity costs in the PacifiCorp d/b/a Pacific Power (“PacifiCorp”) service territory.

7. Petitioners are concerned with a number of issues raised in PacifiCorp’s request for a rate revision. Of particular interest, Petitioners are concerned with the overall impact of the proposed rate increase on PacifiCorp’s low-income customers, the policy and program decisions PacifiCorp is making to incorporate equity into its operations, and PacifiCorp’s proposal to recover wildfire-related costs from customers. Petitioners reserve the right to raise other issues as the proceeding progresses as Petitioners have not yet determined the full extent of the specific relief to be requested. Petitioners anticipate participating to the extent necessary to advocate against disproportionate impacts to low-income and underserved ratepayers resulting from rate design and program proposals.

8. Petitioners have a direct and substantial interest in this proceeding that is not adequately represented by any other party. Petitioners highlight the importance of having representation for environmental justice communities in rate case proceedings. Petitioners' ability to represent these low-income customers through intervention ensures their interests are not left behind as rates and programs are developed.

9. Petitioners' intervention motion is timely and their participation will not unreasonably broaden the issues, burden the record, or delay the proceedings.

10. WHEREFORE, Petitioners respectfully request that the Commission enter an Order granting Petitioners' request to intervene to the full extent allowed by law, thereby allowing Petitioners to appear and participate as may be necessary to fully represent its interests in this proceeding.

Dated this 2nd day of May, 2024.

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