Davison Van Cleve PC

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October 9, 2018

Via Electronic Filing

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

In the Matter of PACIFICORP, dba PACIFIC POWER, Re: Application for Authority to Implement Revised Depreciation Rates Docket No. UM 1968

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

<u>/s/ Jesse O. Gorsu</u>ch Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1968

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PACIFICORP, dba PACIFIC POWER,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
Application for Authority to Implement Revised)	
Depreciation Rates.)	
)	

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.

All documents relating to these proceedings should be served on AWEC's attorney and

consultants at the following addresses:

Tyler C. Pepple Davison Van Cleve, P.C. 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Bradley G. Mullins 1750 SW Harbor Way, Ste. 450 Portland, OR 97201 E-Mail: brmullins@mwanalytics.com Telephone: (503) 954-2852 Facsimile: (503) 241-8160

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Lance Kaufman 2623 NW Bluebell Place Corvallis, OR 97330 E-Mail: lance@aegisinsights.com Telephone: (541) 515-0380

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. A list of AWEC members is included as Attachment A. Many members of AWEC are customers of PacifiCorp, as indicated on Attachment A.

4. On September 13, 2018, PacifiCorp filed a request to implement the revised depreciation rates set forth in its updated depreciation study. Any adjustment to such rates will substantially and directly affect those of AWEC's members who purchase power from PacifiCorp. AWEC therefore 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. 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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WHEREFORE, AWEC respectfully requests that the Commission grant its

petition to intervene with full party status in this proceeding.

Dated this 9th day of October, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/Tyler C. Pepple</u> Tyler C. Pepple 1750 SW Harbor Way, Suite 450 Portland, Oregon 97201 (503) 241-7242 phone (503) 241-8160 facsimile tcp@dvclaw.com Of Attorneys for the Alliance of Western Energy Consumers

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ATTACHMENT A MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Airgas USA, LLC Air Liquide Air Products AkzoNobel Alcoa **Amcor Rigid Plastics** Axiall, Inc. **Basic American Foods** #Boeing **#Boise Cascade**, LLC BYU Idaho #Columbia Steel **Cost Management Services** Darigold Dyno Nobel, Inc. **Emerald Performance Materials, LLC** Evraz, Inc. #Freres Lumber Co. #Georgia-Pacific Idahoan Foods **IGI** Resources Inland Empire Paper Co. Intel Corp **#International Paper** J.R. Simplot Kaiser Aluminum Trentwood Facility #Kapstone Kraft Paper Lamb Weston #Legacy Health Linde, Inc. Microsoft Corporation **#Norpac Foods** #Northwest Hardwoods Oregon Health & Sciences University **#Packaging Corporation of America #PCC Structurals** Pendleton Ponderay Newsprint **REC Solar Grade Silicon LLC** Schnitzer Steel Shell Oil Products US Solvay Chemicals

Supreme Perlite Co. Swanson Group Tesoro Refining and Marketing Co. #Timber Products, Inc. United Energy Trading United States Gypsum #Wah Chang WestRock #Weyerhaeuser NR Co.

#Denotes PacifiCorp Customers