

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
1750 SW Harbor Way, Suite 450
Portland, OR 97201

December 11, 2018

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 PORTLAND GENERAL ELECTRIC COMPANY
Request to Update its Schedule 201 and Standard Power Purchase
Agreements.
Docket No. UM 1987

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Petition to Intervene of the Alliance of Western Energy Consumers.

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

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1987

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY,) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
)
Request to Update its Schedule 201 and)
Standard Power Purchase Agreements.)
)
_____)

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 this proceeding should be served on AWEC’s attorneys at the following addresses:

Tyler C. Pepple	Myraleigh A. Alberto
Davison Van Cleve, P.C.	Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450	5795-B Rogers St.
Portland, OR 97201	Las Vegas, NV 89118
E-Mail: tcp@dvclaw.com	E-Mail: maa@dvclaw.com
Telephone: (503) 241-7242	Telephone: (503) 241-7242

AWEC is an incorporated, non-profit association of large energy users in the Pacific Northwest, with offices in Portland, Oregon. A list of AWEC members is included as Attachment A. Many members of AWEC are customers of Portland General Electric Company (“PGE” or the “Company”), as indicated on Attachment A.

4. PGE seeks Commission approval of its revisions to Schedule 201 and to its standard power purchase agreements, which were filed on December 7, 2018. The Company’s proposed updates may substantially and directly affect those of AWEC’s members who purchase power from PGE. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s rates.

5. AWEC represents the interests of a number of large energy users served by PGE in Oregon. 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.

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

Dated this 11th day of December, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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

ATTACHMENT A
MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Liquide
Air Products
AkzoNobel
Alcoa
Ampcor Rigid Plastics
Axiall, Inc.
Basic American Foods
*Boeing
*Boise Cascade, Inc.
BYU Idaho
Columbia Steel
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
*Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Idahoan Foods
Inland Empire Paper Co.
*Intel Corp
*International Paper
Johnson Controls, Inc.
*JR Simplot
Kaiser Aluminum Trentwood Facility
Kapstone Kraft Paper
Lamb Weston
*Legacy Health
Microsoft Corporation
Nippon Dynawave Packaging Co.
*Norpac Foods
North Pacific Paper Co.
Northwest Hardwoods
NW Innovation Works
On Semiconductor
*Oregon Health Sciences University
*Packaging Corporation of America
Pendleton
Ponderay Newsprint
*Precision Castparts
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
United States Gypsum Co.
University of Oregon
Wah Chang
*WestRock
Weyerhaeuser NR Co.

**Denotes PGE Customers*