

Portland General Electric Company

Legal Department 121 SW Salmon Street • 1WTC1301 • Portland, OR 97204 Phone 503-464-7717 • Fax 503-464-2200 portlandgeneral.com

October 9, 2019

Via Email

Public Utility Commission of Oregon Filing Center 201 High Street SE, Suite 100 Post Office Box 1088 Salem, Oregon 97308-1088

Re: UM 2024 – In the matter of Alliance of Western Energy Consumer's Petition for

Investigation Into Long-Term Direct Access Programs

Attention Filing Center:

Enclosed please find Portland General Electric Company's Petition to Intervene for filing in the above-mentioned docket.

The enclosed documents are being filed by electronic mail with the Filing Center.

Thank you in advance for your assistance.

Sincerely,

Danielle McCain Legal Assistant

dm Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2024

In the Matter of

ALLIANCE OF WESTERN ENERGY CONSUMERS

Petition for Investigation Into Long-Term Direct Access Programs.

PETITION TO INTERVENE OF PORTLAND GENERAL ELECTRIC COMPANY

Portland General Electric Company (PGE) respectfully petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-001-0300 and ORS 756.525. In support of this petition, PGE provides the following:

a) The name and address of the Company is:

Portland General Electric Company 121 Southwest Salmon Street Portland, Oregon 97204

b) The names and addresses of the persons to be included on the official service list in this proceeding are:

Erin Apperson, OSB No. 175771 Assistant General Counsel Portland General Electric Company 121 SW Salmon Street, 1WTC1301 Portland, OR 97204

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c) PGE is an electric public utility subject to the jurisdiction of the Oregon Public

Utility Commission (Commission). Decisions made and precedent established in

this proceeding may directly affect PGE. As such, PGE has a direct and substantial

interest in the issues raised in this proceeding.

d) PGE has special knowledge or expertise that may assist the Commission in

resolving the issues in the proceeding.

e) PGE intends to monitor the proceeding and, if necessary, raise issues and submit

testimony appropriate to the proceeding. No other party could adequately represent

the interests of PGE.

f) Based on the information provided above in compliance with the Commission's

rules of procedures, PGE requests approval to participate in these proceedings as an

intervenor. PGE's participation in this docket will not unreasonably broaden the

issues, burden the record, or unreasonably delay this proceeding.

PGE therefore respectfully requests that the Commission grant this petition to intervene.

DATED this 9th day of October, 2019.

Respectfully submitted,

Erin Apperson, OSB No. 175771

Assistant General Counsel

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