

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2063

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	PETITION TO INTERVENE OF SMALL
APPLICATION FOR DEFERRED)	BUSINESS UTILITY ADVOCATES
ACCOUNTING OF COSTS ASSOCIATED)	
WITH THE COVID-19 PUBLIC HEALTH)	
EMERGENCY)	

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Small Business Utility Advocates, (“SBUA”), petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

1. The contact information for Petitioner to be included on the service list is:

James Birkelund
SBUA
548 Market Street, Suite 11200 San Francisco, CA 94104
E: james@utilityadvocates.org T: 415.602.6223

Frederick Randall II
SBUA
P.O. Box 1063, Quechee, VT 05059
E: frederick@utilityadvocates.org T: 334.224.7404

2. SBUA will be represented in this matter by the following:

Diane Henkels, Attorney
SBUA
621 SW Morrison St. Ste 1025 Portland, OR 97205
E: diane@utilityadvocates.org T: 541.270.6001

3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has over 200 members, of which many are Oregon-based entities. Many Oregon SBUA members are customers of PacifiCorp d/b/a Pacific Power (“Company”). SBUA provides information and assistance to small business with regard to utility matters, and represents small business community regarding proceedings before utility commissions and other public bodies. SBUA’s interest in this docket is to ensure that proceedings and any deferral of costs that are the subject of this docket is just and reasonable for small commercial customers, known as Schedule 23. SBUA seeks also to protect fair application of the UM 2114 Stipulated Agreement on Effects of COVID-19 Pandemic on Energy Utility Customers (“Stipulation”), adopted in Order 20-401¹, to small commercial where this Stipulation applies to deferral of costs and small commercial customers.

4. SBUA has special knowledge and expertise to contribute to this docket from the perspective of small firms in the State of Oregon. In addition to participating in the workshops and other meetings leading up to the establishment of the related docket UM 2114 and the Stipulation, and provided public comment along the way. SBUA and its legal counsel have substantial expertise working with and representing small business generally, and significant experience in utility regulatory matters, including representing and advising small business in ratemaking and other utility regulatory matters. In the past several years, SBUA has intervened in several dockets regarding PacifiCorp d/b/a Pacific Power including the recent UE 374 Request for General Rate Revision.

¹ Order 20-401, dated November 5, 2020 in UM 2114 Investigation into the Effects of the COVID-19 Pandemic on Utility Customers.

5. SBUA has a direct and substantial interest in this proceeding that is not represented by any other party, and will be affected by any Commission determination made in connection with this proceeding. No other party represents exclusively small business often expressed as small nonresidential ratepayers. Citizens Utility Board (“CUB”) provides provided seasoned representation but does not by statute and practice represent SBUA’s constituency and is likely to have conflicts in one or more of the topic areas. Other parties have not represented the interests of the small commercial customer. It is in the public interest to allow SBUA to intervene in this proceeding. SBUA’s intervention 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. SBUA requests the addresses above be added to the service list.

RESPECTFULLY SUBMITTED February 4, 2020



s/ Diane Henkels

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