BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2114

In the Matter of)	
INVESTIGATION INTO THE EFFECTS OF THE COVID-19 PANDEMIC ON UTILITY CUSTOMERS)))	PETITION TO INTERVENE OF SMALL BUSINESS UTILITY ADVOCATES
)	

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 james@utilityadvocates.org

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

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

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- 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. Oregon SBUA members are investor-owned electric or natural gas utility customers. SBUA provides information and assistance to small business with regard to utility matters. SBUA represents small business community regarding proceedings before utility commissions and other public bodies, educates and provides advice to small businesses with respect to utility service. The nature and extent of SBUA's interest in this docket includes addressing the effects of the COVID-19 pandemic on the small commercial customers of electric and natural gas utilities and on small businesses generally.
- 4. SBUA has special knowledge and expertise to contribute to this docket from the perspective of small firms in the State of Oregon. SBUA has participated in the underlying workshops and negotiations leading to the related COVID-19 Stipulation that is part of this docket. 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. SBUA participated in workshops and other meetings, including Commission Public Meetings, pertaining to this COVID-19 subject area. SBUA has provided small commercial related public comment in this docket.
- 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, let alone small com-

mercial customers. Citizens Utility Board ("CUB") provides seasoned representation but does not represent SBUA's constituency and is likely to have conflicts in one or more of the topic areas. Groups representing low income customer interests, Oregon's largest county government, and other parties, are stakeholders, but none represent small business or small commercial customers exclusively. 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. SBUA will focus its efforts on advocating interests of small business and small commercial electric and natural gas utility customers, which have been greatly impacted by actions taken stemming from COVID-19. SBUA 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 December 14, 2020



s/ Diane Henkels

Diane Henkels
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