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January 8, 2021

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 PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into Resource Adequacy in Oregon.
Docket No. UM 2143

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,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2143

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF)
OREGON,)
)
Investigation into Resource Adequacy in)
Oregon.)
_____)

PETITION TO INTERVENE OF THE
ALLIANCE OF WESTERN ENERGY
CONSUMERS

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:

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Counsel for AWEC

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. Many members of AWEC are customers of PacifiCorp and Portland General Electric Company (“PGE”).

4. This investigation into resource adequacy in the State of Oregon was opened on the recommendation of Commission Staff in its Staff Report of January 7, 2021, and is the outcome of stakeholder discussions in Docket Nos. UE 358 and UM 2024. The purpose of the investigation is to potentially develop a resource adequacy for electricity providers subject to Commission jurisdiction in the state. Any Commission determination in this proceeding will substantially and directly affect those of AWEC’s members who take bundled or delivery-only service from PacifiCorp and PGE. AWEC therefore requests leave to intervene in the Docket to represent its members who are affected by any change to PacifiCorp and PGE’s rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp and PGE in Oregon. AWEC also has significant experience participating in proceedings before the Commission. 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 8th day of January, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers