Davison Van Cleve PC

Attorneys at Law

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January 3, 2023

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,

Deferral of Emergency Restoration Costs.

Docket No. UM 2271

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Petition to Intervene in the above-referenced docket.

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

Sincerely,

<u>/s/ Jesse O. Gorsuch</u> Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2271

In the Matter of)	
PORTLAND GENERAL ELECTRIC COMPANY,)	PETITION TO INTERVENE OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS
DEFERRAL OF EMERGENCY RESTORATION COSTS.)	

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. ("DVC"). All documents relating to this proceeding should be served on AWEC's attorneys and DVC's paralegal at the following addresses:

Brent L. Coleman

Davison Van Cleve, P.C.

1750 SW Harbor Way, Ste. 450

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Attorney for AWEC

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PAGE 1 – AWEC PETITION TO INTERVENE

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Attorney 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 Portland General Electric Company ("PGE" or the "Company").

4. On December 29, 2022, PGE filed its request for Commission

authorization to defer for later rate-making treatment incremental costs associated with the

recovery of outage, repair, and restoration costs from winter weather events that began on

December 22, 2022. Whether and how such costs are passed along to customers will

substantially and directly affect those of AWEC's members who purchase power from PGE.

AWEC requests leave to intervene in this Docket to represent its members who are affected by

any change to PGE's rates and programs.

5. AWEC represents the interests of a number of large customers served by

PGE in Oregon. AWEC also has significant experience participating in proceedings involving

PGE's rates and programs. 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.

PAGE 2 – AWEC PETITION TO INTERVENE

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Telephone (503) 241-7242

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

Dated this 3rd day of January, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman
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