

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2273**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation Into House Bill 2021  
Implementation Issues

PETITION TO INTERVENE BY  
THE GREEN ENERGY  
INSTITUTE AT LEWIS & CLARK  
LAW SCHOOL

The Green Energy Institute (GEI) at Lewis & Clark Law School petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Carra Sahler  
Company: Green Energy Institute at Lewis & Clark Law School  
Street Address: 10101 S. Terwilliger Blvd.  
City, State, Zip: Portland, OR 97219  
Email Address: sahler@lclark.edu  
Telephone: 503-768-6634

Please include this contact on the service list.

2a. The petitioner  will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Carra Sahler  
Company: Green Energy Institute at Lewis & Clark Law School  
Street Address: 10101 S. Terwilliger Blvd.  
City, State, Zip: Portland, OR 97219  
Email Address: sahler@lclark.edu  
Telephone: 503-768-6634

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Caroline Cilek  
Company: Green Energy Institute at Lewis & Clark Law School  
Street Address: 10101 S. Terwilliger Blvd.

City, State, Zip: Portland, OR 97219  
Email Address: carolinecilek@lclark.edu  
Telephone: 503-768-6690

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The Green Energy Institute at Lewis & Clark Law School is a climate and energy policy institute within Lewis & Clark's Environmental, Natural Resources, and Energy Law Program. GEI's mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid.

4. The nature and extent of the Petitioner's interest in the proceeding is:

GEI supports the equitable implementation of HB 2021 and the transition to clean energy across the State of Oregon in order to eliminate greenhouse gas emissions and mitigate the impacts of climate change. GEI participated in UM 2225 and AR 655. GEI also engaged in this docket by offering comments on the scoping order. GEI has an interest in ensuring the law is implemented consistent with its purpose and this interest cannot be adequately represented by any other party.

5. The issues the Petitioner intends to raise at the proceeding are:

GEI intends to raise and respond to the issues identified in Order 23-194 and such other issues as may arise in the docket, and will not engage in a manner that is unduly duplicative or burdensome.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

GEI has provided research and expertise on sound legal and policy decisions to achieve Oregon's decarbonization goals. GEI participated extensively in multiple dockets concerning the implementation of HB 2021 and has an interest in ensuring that the law is correctly interpreted to accomplish its purpose.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Carra Sahler  
Petitioner or Petitioner's Representative

6/15/2023  
Date Signed