Davison Van Cleve PC

Attorneys at Law

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September 15, 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 PACIFICORP, dba PACIFIC POWER, Application for Authorization of Deferred Accounting Related to Insurance Costs. **Docket No. UM 2301**

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,

/s/ Jesse O. Gorsuch Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2301

In the Matter of)	
PACIFICORP, dba PACIFIC POWER,)	PETITION TO INTERVENE OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS
Application for Authorization of Deferred Accounting Related to Insurance 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:

Tyler C. Pepple Davison Van Cleve, P.C. 107 SE Washington St., Suite 430 Portland, OR 97214 E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Attorney for AWEC Jesse O. Gorsuch Davison Van Cleve, P.C. 107 SE Washington St., Suite 430 Portland, OR 97214 E-Mail: jog@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Paralegal for DVC

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DAVISON VAN CLEVE, P.C. 107 SE Washington St., Suite 430 Portland, OR 97214 Telephone (503) 241-7242 Brent L. Coleman Davison Van Cleve, P.C. 107 SE Washington St., Suite 430 Portland, OR 97214 E-Mail: blc@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Attorney for AWEC

 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 (or "Company").

4. On August 21, 2023, PacifiCorp filed its application for authorization to defer for later ratemaking treatment the costs associated with increased insurance premiums. If approved, PacifiCorp's application will substantially and directly affect those of AWEC's members who purchase power from PacifiCorp. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp's rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp'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

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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 15th day of September, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Brent L. Coleman</u> Brent L. Coleman 107 SE Washington St., Suite 430 Portland, OR 97214 (503) 241-7242 (phone) (503) 241-8160 (facsimile) blc@dvclaw.com Of Attorneys for the Alliance of Western Energy Consumers

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