

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 450

1750 SW Harbor Way
Portland, OR 97201

February 19, 2019

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 PURPA Implementation.
Docket No. UM 2000

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 2000

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF) PETITION TO INTERVENE OF THE
OREGON,) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
)
Investigation into PURPA Implementation.)
_____)

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 and consultant at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: tcp@dvclaw.com
Telephone: (503) 241-7242
Counsel for AWEC

Bradley G. Mullins
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: brmullins@mwanalytics.com
Telephone: (503) 954-2852
Facsimile: (503) 241-8160
Consultant for AWEC

Riley G. Peck
Davison Van Cleve, P.C.
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: rgp@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160
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. A list of AWEC members is included as Attachment A. Many members of AWEC are customers of PacifiCorp and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. The Commission opened its investigation into PURPA implementation at the Commission’s February 14, 2019 Open Meeting. Among the issues the Commission will address in this proceeding are whether it should adjust the standard renewable avoided cost price or the eligibility cap for standard prices, as well as whether the Commission should require utilities to provide information regarding transmission systems to qualifying facilities. Any change in how avoided costs are calculated will directly affect those of AWEC’s members who purchase power from PacifiCorp and PGE. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s and PGE’s rates.

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.

PAGE 2 – PETITION TO INTERVENE OF AWEC

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 19th day of February, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

ATTACHMENT A
MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Liquide
Air Products
AkzoNobel
Alcoa
Amcor Rigid Plastics
Axiall, Inc.
Basic American Foods
#*Boeing
#*Boise Cascade, LLC
BYU Idaho
#Columbia Steel
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials, LLC
*Evraz, Inc.
#Freres Lumber Co.
#Georgia-Pacific
Idahoan Foods
Inland Empire Paper Co.
*Intel Corp
#*International Paper
Johnson Controls, Inc.
*J.R. Simplot
Kaiser Aluminum Trentwood Facility
#Kapstone Kraft Paper
Lamb Weston
#*Legacy Health
Microsoft Corporation
Nippon Dynawave
#*Norpac Foods
North Pacific Paper Company
#Northwest Hardwoods
NW Innovation Works
On Semiconductor
*Oregon Health & Sciences University
#*Packaging Corporation of America
Pendleton
Ponderay Newsprint
#Precision Castparts
REC Solar Grade Silicon LLC
*Schnitzer Steel
Shell Oil Products US

Solvay Chemicals
Supreme Perlite Co.
Swanson Group
Tesoro Refining and Marketing Co.
#Timber Products, Inc.
United States Gypsum Co.
University of Oregon
#Wah Chang
*WestRock
#Weyerhaeuser NR Co.

#Denotes PacifiCorp Customers

**Denotes PGE Customers*