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June 25, 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 Rulemaking to Review and Amend Division 001 Procedural Rules
Docket No. AR 641

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Comments 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

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 641

In the Matter of Rulemaking to Review and Amend Division 001 Procedural Rules	))))	COMMENTS OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS

I. INTRODUCTION

The Oregon Public Utility Commission ("Commission") opened AR 641 in order to review and amend Division 001 procedural rules. The Alliance of Western Energy Consumers ("AWEC") submits the following comments in response to Chief Administrative Law Judge ("ALJ") Moser's June 16, 2021 email requesting comments on rule sections OAR 860-001-0180, OAR 860-001-0400, OAR 860-001-0570, OAR 860-001-0140, OAR 860-001-150, OAR 860-001-0160, OAR 860-001-0210, OAR 860-001-0220, OAR 860-001-0230, OAR 860-001-0240, OAR 860-001-0250, OAR 860-001-0260, OAR 860-001-0560, OAR 860-001-0430, OAR 860-001-0700, OAR 860-001-0710, and OAR 860-001-0720. Below, AWEC provides redlines to OAR 860-001-0180.

a. OAR 860-001-0180

OAR 860-001-0180 addresses service in contested case and declaratory ruling proceedings. Per OAR 860-001-0180(1)(a), "[e]ach party must identify at least one party representative to receive service, and may identify no more than three party representatives to receive service." It is AWEC's experience that identifying no more than three party

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representatives to receive service may be insufficient and overly restrictive. To properly accommodate those directly involved with contested case and declaratory ruling proceedings—including attorneys, administrative staff, and experts—AWEC suggests OAR 860-001-0180(1)(a) be revised to allow four party representatives to receive service. With such a revision, OAR 860-001-0180(1)(a) would read as follows: "[e]ach party must identify at least one party representative to receive service, and may identify no more than ~~three~~ four party representatives to receive service."

II. CONCLUSION

AWEC appreciates the opportunity to provide comments on the rule sections outlined above and looks forward to working with the Commission and stakeholders to this docket.

Dated this 25th day of June, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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