

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 335

In the Matter of)	
)	
Portland General Electric (PGE))	PETITION TO INTERVENE
)	OF SMALL BUSINESS
2018 General Rate Revision)	UTILITY ADVOCATES
)	
)	
)	

Pursuant to ORS 756.525, and OAR 860-001-0300(2), Small Business Utility Advocates, (“SBUA”), hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

- 1. The contact information for SBUA to be included on the service list is:

James Birkelund SBUA
548 Market Street, Ste 11200 San Francisco, CA 94104
james@utilityadvocates.org

- 2. SBUA will be represented in this matter by the following:

Diane Henkels
Of Counsel, Cleantech Law Partners, PC
420 SW Washington St. Ste 400 Portland, OR 97204
Tel: 541-270-6001
dhenkels@cleantechlaw.com

- 3.SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has approximately 250 members, many of whom are based in Oregon, and some of those members are Portland General Electric (PGE) customers with Schedule 32 electric service. SBUA’s membership in-

cludes at least one member organization that has members located in or done business in different parts of Oregon. SBUA provides information and assistance regarding utility rates on small businesses, notifies the small business community regarding proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provides advice to small businesses with respect to utility service. The nature and extent of SBUA's interest in this docket includes representing the interests of PGE's small business ratepayers, and the interest of other small-business ratepayers.

4. SBUA's comments will focus on areas where PGE's proposed changes will impact its members' interests. Specifically, SBUA seeks to review the basis for the proposed 7.1% increase to Schedule 32 customers estimated base rate that PGE has justified based upon increased distribution and information technology charges. Additionally, SBUA will review the basis for increasing the Schedule 32 Monthly Customer Charge to \$3.00 for Single Phase and \$6.00 for Poly Phase. SBUA may review other aspects of this rate increase request.
5. SBUA has special knowledge and expertise to contribute to this docket from previous experience testifying before and participating in matters before the Commission and the Oregon Legislature. SBUA's expertise focuses on the relation of small businesses in a wide variety of industries to Oregon's economy, and also with regard to the impact on small nonresidential ratepayers of rate changes related to a shift to more energy efficiency and renewables. Additionally, SBUA's legal counsel has significant experience in utility regulatory matters advising small-business and residential clients in rate-making proceedings in electricity matters.
6. As illustrated above, SBUA 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. SBUA's interven-

tion 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.

7. SBUA requests the addresses above be added to service list.

RESPECTFULLY SUBMITTED March 26, 2018.

s/ Diane Henkels

Diane Henkels
Cleantech Law Partners PC
Counsel for Small Business Utility Advocates