

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 374

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	PETITION TO INTERVENE OF SMALL
)	BUSINESS UTILITY ADVOCATES
Request for a General Rate Revision)	
)	
_____)	

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Small Business Utility Advocates, (“SBUA”), 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 Petitioner to be included on the service list is:

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

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

Diane Henkels, Attorney
SBUA
621 SW Morrison St. Ste 1025
Portland, OR 97205
Tel: 541.270.6001
diane@utilityadvocates.org

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William A. Steele
9554 Brenford Dr.
Highlands Ranch, CO 80130
Tel: 303.921.3808
wa.steele@hotmail.com

3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has over 200 members, of which many are Oregon-based entities. Many Oregon SBUA members are customers of PacifiCorp d/b/a Pacific Power (“Company”). SBUA provides information and assistance to small business with regard to utility matters. SBUA represents small business community regarding proceedings before utility commissions and other public bodies, educates and provides advice to small businesses with respect to utility service. The nature and extent of SBUA’s interest in this docket includes reviewing the revenue requirements, class cost-of-service studies and rate design, application of the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (2020 Protocol), and other topics related to rates and terms and conditions of service for small business focusing on small nonresidential customers.

4. SBUA has special knowledge and expertise to contribute to this docket from the perspective of small firms in the State of Oregon. SBUA and its legal counsel have substantial expertise working with and representing small business generally, and significant experience in utility regulatory matters, including representing and advising small business in ratemaking and other utility regulatory matters. SBUA’s expert is a seasoned consultant, former utility commission staff, and regular instructor for electric utility ratemaking seminars.

5. SBUA has a direct and substantial interest in this proceeding that is not represented by any other party, and will be affected by any Commission determination made in connection with this proceeding. No other party represents exclusively small business often expressed as small nonresidential ratepayers. Citizens Utility Board (“CUB”) and Associated Western Utility Advocates (“AWEC”) provide provided seasoned representation but do not represent SBUA’s constituency and are likely to have conflicts in one or more of the topic areas. It is in the public interest to allow SBUA to intervene in this proceeding. SBUA’s intervention 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. SBUA requests the addresses above be added to the service list.

RESPECTFULLY SUBMITTED February 21, 2020



s/ Diane Henkels

Diane Henkels
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