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Via Electronic Mail – PUC.FilingCenter@state.or.us

March 2, 2020

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301-3398
Attn: Filing Center

Re: Case No. UE-374

Dear Sir or Madam:

Please find attached the PETITION TO INTERVENE OF THE FRED MEYER STORES, INC. A SUBSIDIARY OF THE KROGER CO. AND QUALITY FOOD CENTERS for filing in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,

Kurt J. Boehm
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

KJBkew
Enclosure

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 2nd day of March, 2020.

Kurt J. Boehm, _____
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 374

In The Matter Of	:	PETITION TO INTERVENE OF
PACIFICORP, dba PACIFIC POWER	:	FRED MEYER STORES, INC., A SUBSIDIARY OF
	:	THE KROGER CO. AND QUALITY FOOD CENTERS,
Request for a General Rate Revision	:	A DIVISION OF THE FRED MEYER STORES, INC.

Pursuant to ORS §756.525 and OAR §860-001-0300, Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc. (“Fred Meyer”) hereby petitions to intervene in this proceeding with full party status as described in OAR §860-001-0010(7). In support of this petition, Fred Meyer represents as follows:

1. NAME OF PETITIONER: Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc.

ADDRESS: Attn: Corporate Energy Manager, 1014 Vine Street, Cincinnati, Ohio 45202

PHONE NUMBER: 513-762-4538 FAX NUMBER: 513-421-2764

E-MAIL ADDRESS: dgeorge@kroger.com - Please do NOT include this contact on the service list.

**2. NAME OF COUNSEL FOR PETITIONER: Kurt J. Boehm and Jody Kyler Cohn
BOEHM, KURTZ & LOWRY**

COUNSEL’S ADDRESS: 36 East Seventh Street., Suite 1510, Cincinnati, OH 45202

COUNSEL’S PHONE NUMBER: 513-421-2255

COUNSEL’S FAX NUMBER: 513-421-2764

COUNSEL’S E-MAIL ADDRESS: kboehm@BKLawfirm.com , jkylercohn@BKLawfirm.com

3. NAME OF CONSULTANT FOR PETITIONER: Justin Bieber – Energy Strategies LLC

CONSULTANT’S ADDRESS: 215 South State Street, Suite 200, Salt Lake City, UT 84111

CONSULTANT’S PHONE NUMBER: 801-355-4365

CONSULTANT’S FAX NUMBER: 801-521-9142

CONSULTANT’S E-MAIL ADDRESS: jbieber@energystrat.com

4. FRED MEYER REQUESTS THE ADDRESSES ABOVE BE ADDED TO THE SERVICE LIST.

5. IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The Petitioner is seeking intervention on its own behalf as a customer of PacifiCorp, dba Pacific Power Company. Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

6 NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner operates approximately 14 grocery and discount department stores in the service territory of Pacific Power. The total load of Petitioner is approximately 10 MW. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

7. THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The primary issue Fred Meyer intends to address in this case will be whether the rate increase sought by the Applicant is reasonable and cost justified. We also intend to address whether the proposed allocation of the rate increase and the design of the new rates are just and reasonable.

8. ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a Division of the Fred Meyer Stores, Inc. requests to participate in this proceeding as an intervenor with full party status. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Kurt J. Boehm

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq

BOEHM, KURTZ & LOWRY

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Dated: March 2, 2020

**COUNSEL FOR FRED MEYER STORES, INC.
A SUBSIDIARY OF THE KROGER CO. AND
QUALITY FOOD CENTERS, A DIVISION OF
THE FRED MEYER STORES, INC.**