



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 374**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	VITESSE'S
	)	PETITION TO INTERVENE
Request for a General Rate Revision	)	
_____	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Vitesse, LLC (“Vitesse”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, Vitesse provides the following information:

The name and address of Vitesse is:

R. Bryce Dalley  
 Energy Manager  
 Facebook, Inc.  
 1 Hacker Way  
 Menlo Park, CA 94025  
 Telephone: (503) 758-2161  
 E-Mail: rbd@fb.com

Liz Ferrell  
 Associate General Counsel  
 Infrastructure / Legal  
 Facebook, Inc.  
 1 Hacker Way  
 Menlo Park, CA 94025  
 Telephone: (607) 351-0997  
 E-Mail: eferrell@fb.com

All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Irion Sanger  
 Sanger Law P.C.  
 1041 SE 58th Place  
 Portland, OR 97215  
 Telephone: (503) 756-7533  
 E-Mail: irion@sanger-law.com

R. Bryce Dalley  
 Energy Manager  
 Facebook, Inc.  
 1 Hacker Way  
 Menlo Park, CA 94025  
 Telephone: (503) 758-2161  
 E-Mail: rbd@fb.com



Liz Ferrell  
Associate General Counsel  
Infrastructure / Legal  
Facebook, Inc.  
1 Hacker Way  
Menlo Park, CA 94025  
Telephone: (607) 351-0997  
E-Mail: eferrell@fb.com

Vitesse is a limited liability company that is wholly-owned by Facebook, Inc.

Vitesse owns and operates a large data center in Prineville, Oregon (“Data Center”). The Data Center is within the service territory of Pacific Power & Light Company (“Pacific Power”) and is comprised of one or more facilities.

Pacific Power’s 2019 General Rate Case (“GRC”) could have a direct and substantial impact on Vitesse, which has a direct and substantial interest in the GRC. PacifiCorp has proposed a general rate increase of approximately \$70.8 million or 5.4 percent, which includes a general rate increase, the costs of the early closure of Cholla Unit 4, and amortization deferred tax benefits. Vitesse purchases power for the Data Center from Pacific Power pursuant to the Schedule 48 rate approved by this Commission. Without intervention, Vitesse would not have the ability to participate in the proceeding, which could result in material harm.

Vitesse’s intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, Vitesse’s interest is not adequately represented by any other party in this proceeding.

WHEREFORE, Vitesse respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate, and to otherwise fully participate in the proceedings.



Dated this 25th day of March 2020.

Respectfully submitted,

A handwritten signature in blue ink that reads "Irion Sanger". The signature is written in a cursive style.

---

Irion Sanger  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: (503) 756-7533  
Fax: (503) 334-2235  
irion@sanger-law.com

Of Attorneys for Vitesse, LLC