

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

[UE 416]

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY  
Request for a General Rate Revision and 2024  
Annual Power Cost Update

PETITION TO INTERVENE OF COMMUNITY  
ACTION PARTNERSHIP OF OREGON

The Community Action Partnership of Oregon (CAPO) respectfully petitions to intervene in this proceeding, pursuant to OAR 860-001-0300 and ORS 756.525, to appear and participate as a party with full party status.

1. Contact Information for Petitioner and designated person(s) for service list:

Community Action Partnership of Oregon  
2475 Center Street NE  
Salem, OR 97301  
(see below)

2. CAPO will not be represented by counsel but might retain an attorney at a later point in time. CAPO's authorized representative is:

Benedikt Springer, PhD  
Utility Policy Analyst, CAPO  
3817 NE Couch Street  
Portland, OR 97232  
661 281 8139  
[benedikt@caporegon.org](mailto:benedikt@caporegon.org)

3. CAPO seeks intervention on its own behalf and on behalf of the individuals and communities it serves and represents, who are customers of Portland General Electric (PGE). CAPO is not seeking intervention as a member of or in association with any other organization. However, CAPO is committed to collaborating with other intervenors when interests overlap and compromising with other intervenors when they don't.
4. CAPO is a 501(c)(3) non-profit formed by the 17 Oregon community action agencies and a special purpose organization, the Oregon Human Development Corporation. Our organizations plan, implement, and deliver anti-poverty programs across all of Oregon's 36 counties, including homeless shelters, food banks, and Head Start. Our network is also responsible for implementing state- and federally-funded weatherization programs (e.g. ECHO, WAP) as well as energy assistance programs (e.g. LIHEAP, OEAP). Five of our member organizations have clients that are served by PGE: Yamhill County Community Action, Washington Community Action Organization, Mid-Willamette Community Action Agency, Multnomah County Youth and Family Services Division, and Clackamas County Social Services. As an association, our mission is to magnify the anti-poverty efforts of our network through advocacy in legislative and regulatory

proceedings. We serve tens of thousands of low-income households every year. Our advocacy is based on this experience. Unfortunately, in the past, low-income customers have seen little representation in contested proceedings like this general rate revision. CAPO's participation will ensure that the interests of PGE low-income customers (there are around 114,000) have a higher chance of receiving adequate consideration in this case.

5. CAPO's interest in this proceeding stems from the potential impacts of this rate revision on the ability of low-income, energy-burdened customers to afford their energy bills. This perspective is not sufficiently covered by existing intervenors. CAPO has not yet determined the full extent of the specific relief it will request but is focusing on two questions:
  - a. Are existing assistance programs sufficient to make electricity affordable to low-income customers? Will rate increases exacerbate current energy burdens? Is it in the public interest to consider low-income customers as a separate class?
  - b. Are formal processes and informal practices of contested proceedings like this in line with the state of Oregon's commitment to environmental justice, especially its procedural justice requirements? Can proceedings be made more accessible for various affected communities?
6. CAPO will contribute expertise in this docket based on the experience of its network in working with low-income clients. CAPO has previously participated in OPUC proceedings, such as UM 2211 or AR 653. CAPO's authorized representative holds a PhD in political science and has many years of experience in regulatory policy and research. CAPO is specifically participating without expensive legal representation to see how accessible this proceeding is to community members with relevant expertise that is not filtered through various gate-keeping institutions. CAPO will refrain from making any legal arguments as directed by law (860-001-0310 (2)(b)), but focus on the normative considerations inherent to decisions on affordability in rate spread (ORS 757.230) and determinations of the public interest (ORS 757.210 (2)(b)).
7. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of CAPO's Petition to Intervene. CAPO is committed to efficient and effective proceedings without any unreasonable delays.
8. Wherefore, CAPO respectfully requests that the Commission enter an order granting CAPO permission to intervene in this docket and to participate to the full extent allowed by law so that it may appropriately represent the interests of low-income customers in this proceeding.

Dated this 9<sup>th</sup> day of May 2023.



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