

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 450
1750 SW Harbor Way
Portland, OR 97201

March 19, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PACIFICORP, dba PACIFIC POWER,
Application for Approval of 2020 All-Source Request for Proposal.
Docket No. UM 2059

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2059

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER) PETITION TO INTERVENE OF THE
) ALLIANCE OF WESTERN ENERGY
) CONSUMERS
Application for Approval of 2020 All-Source)
Request for Proposal.)
_____)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Alliance of Western Energy Consumers (“AWEC”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7). In support of this petition, AWEC represents as follows:

1. The business address of AWEC is:

Alliance of Western Energy Consumers
818 SW 3rd Ave., #266
Portland, OR 97204
2. AWEC will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to this proceeding should be served on AWEC’s attorneys and consultant at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: tcp@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

Bradley G. Mullins
10147 Moratac Drive
Tualatin, OR 97062
E-Mail: brmullins@mwanalytics.com
Telephone: (503) 841-1465

Brent L. Coleman
Davison Van Cleve, P.C.
1750 SW Harbor Way, Ste. 450
Portland, OR 97201
E-Mail: blc@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

3. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. Many members of AWEC are customers of PacifiCorp (or “Company”).

4. On February 24, 2020, PacifiCorp filed a request for approval of the Company’s 2020 All-Source Request for Proposals (“RFP”), which would 1) solicit up to 4,400 megawatts (“MW”) of new generating resources and 600 MW of energy storage resources, and 2) appoint an independent evaluator to oversee the RFP, as required by the Commission’s competitive bidding rules. If approved, the Company’s All-Source RFP could substantially and directly affect those of AWEC’s members who purchase power from PacifiCorp. AWEC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates and programs.

5. AWEC represents the interests of a number of large customers served by PacifiCorp in Oregon. AWEC also has significant experience participating in proceedings involving PacifiCorp’s rates and programs. AWEC’s intervention 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.

6. As described above, AWEC 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. It is in the public interest to allow AWEC to intervene in this proceeding.

WHEREFORE, AWEC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 19th day of March, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 phone

(503) 241-8160 facsimile

tcp@dvclaw.com

Of Attorneys for the Alliance of Western Energy

Consumers