

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2273

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation Into House Bill 2021  
Implementation Issues

PETITION TO INTERVENE

Columbia River Inter-Tribal Fish Commission (CRITFC) petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Rob Lothrop  
Company: Columbia River Inter-Tribal Fish Commission  
Street Address: 700 NE Multnomah, Suite 1200  
City, State, Zip: Portland, OR 97232  
Email Address: lotr@critfc.org  
Telephone: 503-318-5850

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Christine Golightly  
Company: Columbia River Inter-Tribal Fish Commission  
Street Address: 700 NE Multnomah, Suite 1200  
City, State, Zip: Portland, OR 97232  
Email Address: golc@critfc.org  
Telephone: 503-407-2003

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Patrick Oshie  
Company: Contractor for Columbia River Inter-Tribal Fish Commission  
Street Address: 507 Ballard Rd.

City, State, Zip: Zillah, WA 98953  
Email Address: patri50931@aol.com  
Telephone: 360-870-2218

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

CRITFC is a Commission of four tribes:  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Confederated Tribes of Umatilla Indian Reservation  
Confederated Tribes and Bands of the Yakama Nation  
Nez Perce Tribe

CRITFC was formed to ensure a unified voice in the overall management of the fishery resources, and as managers, to protect reserved treaty rights through the exercise of the inherent sovereign powers of its member tribes.

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

In furtherance of its mission and the interests of its member tribes, the Columbia River Inter-Tribal Fish Commission (CRITFC) produced a 2022 Energy Vision for the Columbia River Basin, which is available in full at [www.critfc.org/energy-vision/](http://www.critfc.org/energy-vision/). The 2022 Energy Vision calls for the reduction in fossil fuel reliance consistent with HB 2021 and provides 43 recommendations to guide the region to an energy transition that meets the needs of anadromous fish and our member tribes' communities. To this extent, CRITFC has an interest in assuring that the proceedings and determinations in UM 2273 are consistent with our Energy Vision and the needs of our member tribes.

5. The issues the Petitioner intends to raise at the proceeding are:

Properly defining community benefit indicators (CBIs) to include the full range of benefits to tribal communities affected by Oregon's clean energy policies.

Assuring that cost-effectiveness determinations capture circumstances and effects that deeply affect tribal communities, such as the availability of healthy harvestable salmon runs, but that are not ordinarily quantified in regulatory proceedings addressing investor owned utilities.

Why the backdrop of the tribes' treaty secured interests in their First Foods and how the Energy Vision's recommendations are intended to protect them is relevant to environmental justice outcomes in UM 2273.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

CRITFC has substantial expertise in addressing the effects of energy development in the context of the Columbia Basin's ecosystems. Wy-Kan-Ush-Mi Wa-Kish-Wit, the Spirit of the Salmon Plan developed by CRITFC provides numerous examples of CRITFC's expertise in subject matter areas concerning traditional ecological knowledge, climate science, hydropower impact mitigation and gravel-to-gravel management of salmon resources. See <https://plan.critfc.org/>.

The development and operation of the Columbia Basin's hydro system is at the foundation of electrical energy services in the State of Oregon. The continuing impacts of this hydro development to tribal communities served by CRITFC, to anadromous fish, and to other treaty secured resources has created environmental justice issues that have persisted for decades. The proceedings and determinations in UM 2273 offer opportunities to benefit the tribal communities that have borne the brunt of the region's hydropower development and to prevent the recurrence of similar injustice during the current energy transition. Also, these communities are most sensitive to the effects of climate change because of its effects on tribal First Foods. Finally, CRITFC is the sole entity that has the expertise and experience to articulate the impacts of energy development on tribal communities and treaty rights and its presentation will help inform the Commission's consideration of the matters presented in this docket.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Christine Golightly  
Petitioner or Petitioner's Representative

June 20, 2023  
Date Signed