

# Davison Van Cleve PC

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January 11, 2024

## *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 PUBLIC UTILITY COMMISSION OF OREGON,  
Investigation into House Bill 2021 Implementation Issues.  
**Docket No. UM 2273**

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 contact me.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**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 OF THE  
ALLIANCE OF WESTERN ENERGY  
CONSUMERS

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.

(“DVC”). All documents relating to this proceeding should be served on AWEC’s attorneys and DVC’s paralegal at the following addresses:

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Davison Van Cleve, P.C.  
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Paralegal for DVC

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 and Portland General Electric Company (the “Utilities”).

4. The Commission opened this investigation on February 23, 2023, to investigate implementation issues associated with House Bill 2021. The outcome of this proceeding will directly affect those of AWEC’s members who purchase power from the Utilities. AWEC therefore requests leave to intervene in this Docket to represent its members who are affected by any change to the Utilities’ rates and programs.

5. AWEC represents the interests of a number of large customers served by the Utilities in Oregon. AWEC also has significant experience participating in proceedings before the Commission. 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.

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

Dated this 11th day of January, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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*Attorney for the Alliance of Western Energy Consumers*