

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. DR-40

In the Matter of

HONEYWELL INTERNATIONAL, INC.,  
and HONEYWELL GLOBAL FINANCE,  
LLC,  
and  
PACIFICORP, dba PACIFIC POWER.

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PETITION TO INTERVENE

NAME OF PETITIONER:	SunEnergy Power Corporation
ADDRESS:	1133 NW Wall Street, Suite 305, Bend, Oregon 97701-1968
PHONE NUMBER:	503-922-1548 (office); 619-548-4315 (mobile)
FAX NUMBER:	503-922-1552
E-MAIL ADDRESS:	dparsons@SunEnergyPower.com

NAME OF COUNSEL FOR PETITIONER:	None for this petition.
COUNSEL'S ADDRESS:	
COUNSEL'S PHONE NUMBER:	
COUNSEL'S FAX NUMBER:	
COUNSEL'S E-MAIL ADDRESS:	

<b>IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:</b>
SunEnergy Power Corporation ( <a href="http://www.SunEnergyPower.com">www.SunEnergyPower.com</a> ) is an Oregon domestic business corporation with three principals and less than ten employees.
SunEnergy Power Corporation develops distributed commercial-scale solar electric power projects in the U.S. to directly fund and implement humanitarian renewable energy projects in remote, rural regions of the world.

**NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:**

SunEnergy Power Corporation is a vertically integrated service organization involved in all stages of the photovoltaic (PV) project lifecycle including marketing, sales, finance, design, engineering, installation, ongoing maintenance, upgrading and eventual disposition.

SunEnergy Power Corporation has spent substantial funds and personnel resources over the last two years establishing its operation in Oregon, which includes the development of both directly-sold commercial PV systems as well as third-party owned "hosted" commercial PV systems. The hosted side of our business includes a number of commercial and large-scale PV systems within Pacific Power territory including an ~ 200 kWp DC system for the City of Bend's Centennial Parking Plaza, an ~ 280 kWp DC system for Earth2O in Culver, a 2.0 MWp DC (i.e. 2,000 kWp DC) system for the City of Medford's Regional Water Reclamation Facility, a 2.0 MWp DC system for the City of Corvallis' Wastewater Treatment Plant, and others.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:**

SunEnergy Power Corporation has devoted a significant portion of its business model, finances and personnel resources to developing third-party owned commercial scale PV systems in the State of Oregon, in large part based on the State's Net Metering Law (ORS 757.300) and the Oregon PUC's net metering rules (OAR 860.039). If the PUC makes a ruling in favor of Pacific Power that either (i) developers of third-party owned PV systems must be Electricity Service Suppliers, or (ii) third-party owned PV systems are not eligible for net metering, our company will be forced to summarily close down this portion of our business in Oregon.

**ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:**

In the last five years the founders have designed and successfully installed over 400 separate solar electric systems (totalling over three Megawatts of generating capacity) in a wide variety of applications, principally in California. Our company has its headquarters in Bend, Oregon; is a registered general contractor in Oregon; and is a Solar Trade Ally of the Energy Trust of Oregon.

SunEnergy Power Corporation has a detailed working knowledge of the myriad of detail involved in third-party financed commercial-scale solar electric projects.

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 860-012-0001.

Douglas J. Parsons, CEO & Director

  
Petitioner or Petitioner's Representative

19 June 2008

Date



# SunEnergy Power Corporation

Sustainable Social Entrepreneurship™