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August 8, 2011

VIA ELECTRONIC FILING AND U.S. MAIL

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
P.O. Box 2148
Salem, OR 97308-2148

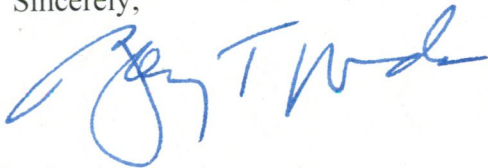
RE: UM 1415- Staff Investigation into Cost Methods for Use in Developing Electric Rate Spreads/ Petition to Intervene/ ECOtality, Inc.

Dear Sir/Madam:

ECOtality encloses for filing its signed original Petition to Intervene in the above referenced docket along with two copies.

Please contact me at the above mentioned address and at (503) 504-6492 should you have any questions relating to this filing.

Sincerely,



Barry T. Woods
Counsel for ECOtality
OSB# 951332

BTW/btw
Enclosures
Cc: Service List- UM 1415

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of UM 1415, Staff
Investigation into Cost Methods for
Use in Developing Electric Rate Spreads

ECOTALITY, INC.
PETITION TO INTERVENE
 and WAIVER OF PAPER
SERVICE

ECotality, Inc. 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: Alana Chavez-Langdon
Company: ECotality, Inc.
Street Address: 4 Embarcadero Center Suite 3720
City, State, Zip: San Francisco, CA 94111
Email Address: achavez@ecotality.com
Telephone: (480) 219-5005

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: Barry T. Woods, Esq.
Company: www.sustainableattorney.com
Street Address: 5608 Grand Oaks Drive
City, State, Zip: Lake Oswego, OR 97035
Email Address: woods@sustainableattorney.com
Telephone: (503) 504-6492

- 2b. Additional contacts to be included on the service list (a petitioner is limited to two contacts on the service list UNLESS waiving paper service):

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

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

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

Additional contacts to be included on the service list are listed on an attached sheet.

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

List of Members attached

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

To be an active participant in the proceeding as the Oregon PUC continues its investigation into the role of utilities and rate setting in transportation electrification. We anticipate providing input where and when appropriate.

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

ECOtality has been participating the UM 1461 and sees several potential cross-over issues being investigated in UM 1415 that bear on utility involvement in the electric vehicle space, including, but not limited to, the impact of mandatory and voluntary time-varying rates on consumer behavior, the technologies available to mitigate rate impacts on customers, and consumer education.

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

ECOtality is currently implementing a portion of The EV Project in Oregon for the U.S. Department of Energy. The EV Project will collect and analyze data to characterize vehicle use in diverse topographic and climatic conditions, evaluate the effectiveness of charging infrastructure, and conduct trials of various revenue systems for commercial and public charging infrastructure. The use and impact

of time-varying rates, whether mandatory or voluntary, for EV charging is of direct importance to our study.

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. See OAR 860-001-0300



Barry T. Woods, OSB # 95133
Attorney for ECotality, Inc.

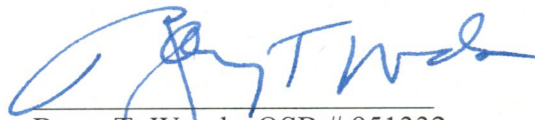
8/8/11

Date Signed

CERTIFICATE OF SERVICE

I hereby certify that on this day, August 8, 2011, I served a true and correct copy of the foregoing document in Docket No. UM 1415 upon each party listed in the UM 1415 OPUC Service List by email and, where paper service is not waived, by U.S. Mail, postage pre-paid.

Dated at Portland, Oregon, this 8th day of August, 2011.



Barry T. Woods, OSB # 951332
woods@sustainableattorney.com
503-504-6492 (w)

On behalf of ECOtality, Inc.
80 E. Rio Salado Parkway, Suite 710
Tempe, AZ 85281

Summary Report**UM 1415 INVESTIGATION INTO COST METHODS FOR USE IN DEVELOPING ELECTRIC RATE SPREADS****Category:** Miscellaneous

In the Matter of the
PUBLIC UTILITY COMMISSION OF OREGON
Staff Investigation into Cost Methods for Use in Developing Electric Rate Spreads.

(See UE 197, Order No. 08-585, ordering paragraph 3.)

Filing Date: 1/30/2009

Case COMPTON, GEORGE

Law Judge(s): HARDIE, LISA D

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Summary Report

UM 1415 INVESTIGATION INTO COST METHODS FOR USE IN DEVELOPING ELECTRIC RATE SPREADS

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