



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

FILE CODE:

June 1, 2009

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: PORTLAND GENERAL ELECTRIC COMPANY Schedule 122 Update to
Renewable Resources Automatic Adjustment Clause
Docket No. UE 209

Enclosed please find the original Petition to Intervene on behalf of the Oregon
Department of Transportation in the above-referenced docket.

Thank you for your assistance.

Sincerely,

Kathy Kleen
Executive Assistant

Enclosures

cc: Service List



BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON

UE 209

In the Matter of

PORLAND GENERAL ELECTRIC
COMPANY Schedule 122 Update to
Renewable Resources Automatic
Adjustment Clause

OREGON DEPARTMENT OF
TRANSPORTATION PETITION TO
INTERVENE

Pursuant to ORS 756.525 and OAR 860-012-000, the Oregon Department of Transportation (ODOT) respectfully petitions the Oregon Public Utility Commission for leave to intervene in this proceeding.

In support of this petition, ODOT represents as follows:

1. Name and Address of Petitioner:

Oregon Department of Transportation
Attn: James Whitty, Manager
Office of Innovative Partnerships
Transportation Building Room 115
355 Capitol Street N.E.
Salem Oregon 97310
Phone: (503) 986-4284
Email: jim.whitty@odot.state.or.us

2. Communications: Communications and documents relating to these

proceedings should be addressed to ODOT's representative and consultant as follows:

Oregon Department of Transportation
Attn: James Whitty, Manager
Office of Innovative Partnerships
Transportation Building Room 115
355 Capitol Street N.E.
Salem Oregon 97310
Phone: (503) 986-4284
Email: jim.whitty@odot.state.or.us

Five Stars International, Ltd.
Attn: Lynn Frank
2522 19th ST SE
Salem Oregon 97302
Phone: (503) 510-1165
Email: Lynn.Frank@fivestarsintl.com

- 3. Substantial Interest:** ODOT has a substantial interest in PGE's Schedule 122 Update to Renewable Resources Automatic Adjustment Clause ("Update"). The Update filed by PGE on April 1, 2009 specifically includes the costs, benefits, and revenue requirement impacts of three renewable projects, including the ODOT solar highway demonstration project. This was America's first solar highway project and was developed through an innovative public-private partnership with PGE. ODOT has a substantial interest in whether regulatory actions will facilitate or forestall development of further solar highway projects in partnership with PGE.
- 4. Experience:** ODOT has experience participating in a related regulatory proceeding initiated by the Petition for Declaratory Ruling filed by Honeywell International, Inc., Honeywell Global Finance LLC, and PacifiCorp d/b/a Pacific Power, on June 6, 2008 (the "Honeywell Petition"). Related issues included third-party financing and why such financing is essential for solar generating systems to be economically feasible for ODOT.
- 5. Direct Interest:** ODOT has a direct interest in PGE's ability to develop such projects because recent Federal Highway Administration regulatory guidance clearly accommodates development of solar resources by the utility to serve the transportation system as a public benefit and PGE has the demonstrated resources and capabilities needed to site such resources on the transportation system. Because of the public benefit, it is in the public interest to allow ODOT to intervene in the proceeding.
- 6. Focus:** ODOT will not unreasonably broaden the issues, burden the record or delay the proceeding, but will add representation of public interest that cannot be adequately expressed by other parties now in the proceeding.

Based on the foregoing, ODOT respectfully requests the Commission grant this petition to intervene.

Dated: June 1, 2009



James M. Whitty, Manager
Office of Innovative Partnerships
Oregon Department of Transportation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf of the of the Oregon Department of Transportation upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail.

Dated at Salem, Oregon, this 1st day of June, 2009.

Sincerely,



Kathy Kleen
Executive Assistant

SERVICE LIST UE 209

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