

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of LC 56

PETITION TO INTERVENE

Natural Resources Defense Council 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: Angus Duncan, Consultant and Contractor
Company: Natural Resources Defense Council
Street Address: 240 SW First Avenue
City, State, Zip: Portland, OR 97204
Email Address: aduncan@b-e-org
Telephone: 503.248.7695

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

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

Name: Ralph Cavanagh
Company: Natural Resources Defense Council
Street Address: 111 Sutter Street, 20th Floor
City, State, Zip: San Francisco, CA 94104
Email Address: rcavanagh@nrdc.org.
Telephone: 415.875.6100

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:

NRDC, an national environmental organization with 1.4 million members, advocate for conserving environmental values in air, land, water, wildlife, communities, energy and climate.

List of Members attached

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

Petitioner intends to participate in PGE's IRP proceedings to ensure full consideration of low-carbon resource scenarios for serving PGE customer loads in a manner that is reliable, cost-effective and respectful of important environmental values.

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

Petitioner has participated with PGE staff in development of two low-carbon IRP scenarios, and intends to ensure that these scenarios, and the lessons learned in developing them, are fully considered in this IRP proceeding.

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

Petitioner has over three decades experience in utility resource planning, selection and development, including tenure on the NW Conservation and Power Planning Council. Petitioner has professional experience in planning for mitigation of greenhouse gas emissions in utility and transportation sectors. Petitioner has direct participation with PGE (2012-2013) in shaping the low-carbon scenario process, consultant RFP development and consultant selection, scenario development and evaluation.

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.

A handwritten signature in black ink, consisting of a large, stylized initial 'A' followed by several loops and a long horizontal stroke extending to the right.

Petitioner or Petitioner's Representative

Date Signed

May 9, 2013