

# **DEPARTMENT OF JUSTICE**GENERAL COUNSEL DIVISION

December 5, 2014

Attention: Filing Center Public Utility Commission of Oregon 2930 Fairview Industrial Drive SE PO Box 1088 Salem, OR 97308-1088

Re:

In the Matter of PACIFICORP, dba PACIFIC POWER's 2015 Integrated Resource Plan

OPUC Docket No.: LC 62

DOJ File No.: 330030-GN0339-14

Filing Center:

Enclosed for filing with the Commission today are an original and one copy of the Oregon Department of Energy's (ODOE) Petition to Intervene in the above-captioned matter.

Sincerely,

Renee M France

Senior Assistant Attorney General

Natural Resources Section

Enclosures RMF:jrs/#6059683

c: LC 62 service list
Kacia Brockman, ODOE
Phil Carver, ODOE

### BEFORE THE PUBLIC UTILITY COMMISSION

# OF OREGON

LC 62

	•	
In the Matter of	)	
PACIFICORP, dba PACII	IC POWER )	PETITION TO INTERVENE
2015 Integrated Resource	Plan )	
NAME OF PETITIONER	: Oregon Department	of Energy
ADDRESS: 625 Marion S	Street N.E., Salem, OR	97301-3737
PHONE NUMBER: (503	378-4040	
FAX NUMBER: (503) 37	<sup>7</sup> 3-7806	
E-MAIL ADDRESSES:	kacia.brockman@state.or.us phil.carver@state.or.us	
NAME OF COUNSEL FO	OR PETITIONER: Rer	nee M. France, Senior Assistant Attorney
COUNSEL'S ADDRESS:		e, Natural Resources Section 1162 Court

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION: Not applicable.

COUNSEL'S PHONE NUMBER: (503) 947-4520

COUNSEL'S E-MAIL ADDRESS: renee.m.france@doj.state.or.us

COUNSEL'S FAX NUMBER: (503) 378-3784

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

Under ORS 469.030, the Oregon Department of Energy ("ODOE") is statutorily charged with the responsibility to study, evaluate and disseminate information about energy use in Oregon. ODOE's responsibilities include the preparation of a comprehensive energy plan under ORS 460.060 and an energy forecast under ORS 469.070. As part of these responsibilities, under ORS 469.060 ODOE is charged with making "recommendations for state and local governments to assist in the development and maximum use of cost-effective conservation and renewable resources, consistent with the energy policy stated in ORS 469.010 \* \* \*." (ORS 469.060(3)(f)). In aid of that responsibility, ODOE "may intervene in any proceeding undertaken by an agency for the purpose of expressing its views as to the effect of an agency action, upon state energy resources and state energy policy." ORS 469.110(2).

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING: See description of the ODOE's interest, above.

NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESNITATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Kacia Brockman, Oregon Department of Energy, kacia brockman @state.or.us, (503) 373-7955, 625 Marion Street N.E., Salem, OR 97301-3737 and Phil Carver, Oregon Department of Energy, phil.carver @state.or.us, (503) 373-7115, 625 Marion Street N.E., Salem, OR 97301-3737.

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 860-001-300

Petitioner hereby agrees to accept service by electronic mail and waives other forms of service.

Lorc Bensel de Renee France Petitioner or Potitioner's Representative

12/5/2014 Date

#### CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2014, I served the foregoing PETITION TO INTERVENE upon the persons named on the service list, by electronic mail only as all parties have waived paper service.

OPUC Dockets Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400 Portland OR 97205 dockets@oregoncub.org

Jesse E. Cowell (C)
Davison Van Cleve
333 SW Taylor Street, Suite 400
Portland OR 97204
iec@dvclaw.com

Megan Decker 421 SW 6<sup>th</sup> Avenue, Suite 1125 Portland OR 97204 megan@renewablenw.org

G. Catriona McCracken Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400 Portland OR 97205 catriona@oregoncub.org

Derek Nelson Sierra Club Law Program 85 Second Street, 2<sup>nd</sup> Floor San Francisco CA 94105 derek.nelson@sierraclub.org

Travis Ritchie Sierra Club Law Program 85 Second Street, 2<sup>nd</sup> Floor San Francisco CA 94105 travis.ritchie@sierraclub.org Renewable NW Dockets Renewable Northwest 421 SW 6<sup>th</sup> Avenue, Suite 1125 Portland OR 97204 dockets@renewablenw.org

Melinda J. Davison (C)
Davison Van Cleve
333 SW Taylor Street, Suite 400
Portland OR 97204
mjd@dvclaw.com

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
bob@oregoncub.org

Bradley Mullins (C) Mountain West Analytics 333 SW Taylor Suite 400 Portland OR 97204 brmullins@mwanalytics.com

Michael O'Brien Renewable Northwest 421 SW 6<sup>th</sup> Avenue, Suite 1125 Portland OR 97204 michael@renewablenw.org

Gloria D. Smith Sierra Club Law Program 85 Second Street, 2<sup>nd</sup> Floor San Francisco CA 94105 gloria.smith@sierraclub.org Dustin T. Till
Pacific Power
825 NE Multnomah Street, Suite 1800
Portland OR 97232
dustin till@pacificorp.com

(C) = Confidential

DATED this 5 day of December 2014.

Renee M. France, OSB #004472 Senior Assistant Attorney General