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**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

March 20, 2015

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

Re: *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation to  
Explore Issues Related to a Renewable Generator's Contribution to Capacity*  
OPUC Docket No.: UM 1719  
DOJ File No.: 330030-GN0081-15

Filing Center:

Enclosed for filing with the Commission today are an original and one copy of the Oregon Department of Energy's PETITION TO INTERVENE in the above-captioned matter.

Sincerely,

*Lore Benschel*  
for Renee M France  
Senior Assistant Attorney General  
Natural Resources Section

Enclosures  
RMF:jrs/#6376752  
c: Diane Broad, ODOE  
Phil Carver, ODOE

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1719

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) PETITION TO INTERVENE  
OREGON, )  
 )  
Investigation to Explore Issues Related to a )  
Renewable Generator's Contribution to )  
Capacity )

NAME OF PETITIONER: Oregon Department of Energy

ADDRESS: 625 Marion Street N.E., Salem, OR 97301-3737

PHONE NUMBER: (503) 378-4040

FAX NUMBER: (503) 373-7806

E-MAIL ADDRESSES: [diane.broad@state.or.us](mailto:diane.broad@state.or.us)  
[phil.carver@state.or.us](mailto:phil.carver@state.or.us)

NAME OF COUNSEL FOR PETITIONER: Renee M. France, Senior Assistant Attorney  
General

COUNSEL'S ADDRESS: Department of Justice, Natural Resources Section, 1162 Court  
Street N.E., Salem, Oregon, 97301-4096

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

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

COUNSEL'S E-MAIL ADDRESS: [renee.m.france@doj.state.or.us](mailto:renee.m.france@doj.state.or.us)

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

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 REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Diane Broad, Oregon Department of Energy, diane.broad@state.or.us, (503) 378-4035, 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.

Core Bengel for Renee M. France  
Petitioner or Petitioner's Representative

3/20/15  
Date