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DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

November 17, 2017

VIA ELECTRONIC MAIL ONLY

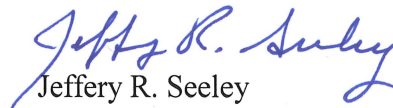
Attention: Filing Center
Public Utility Commission of Oregon
201 High Street, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Draft Storage Potential
Evaluation*
OPUC Docket No.: UM 1856
DOJ File No.: 330030-GN0348-17

Filing Center:

Please find the Oregon Department of Energy's ("ODOE") Petition to Intervene in the
above-captioned matter.

Sincerely,


Jeffery R. Seeley
Legal Secretary
Natural Resources Section

Enclosures

JRS:jrs/#8621875

c: Wendy Simons, ODOE
Jesse Ratcliffe, DOJ

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1856

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE,
COMPANY,)	OREGON DEPARTMENT OF ENERGY
)	
Draft Storage Potential Evaluation)	
_____)	

NAME OF PETITIONER: Oregon Department of Energy

ADDRESS: 550 Capitol Street NE, Salem, OR 97301

PHONE NUMBER: (503) 378-4040

FAX NUMBER: (503) 373-7806

EMAIL ADDRESSES: adam.schultz@oregon.gov
wendy.simons@oregon.gov

NAME OF COUNSEL FOR PETITIONER: Jesse D. Ratcliffe, Assistant Attorney General

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

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

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

COUNSEL'S EMAIL ADDRESS: jesse.d.ratcliffe@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:

As part of its work to promote Oregon’s statutory energy policy, the Department has an interest in the potential for energy storage to support the integration of renewable energy resources as well as the resiliency of Oregon’s energy systems. ODOE has a specific interest in seeing Portland General Electric evaluate a range of different storage types and sizes and to test a range of use cases.

ODOE is an intervenor and has participated in workshops and offered comments in the UM 1751 docket, which was opened to implement House Bill 2193 (2015). House Bill 2193 requires PGE and PacifiCorp to evaluate the storage potential on their respective systems, the proceedings for which have been docketed as UM 1856 and UM 1857. These evaluations will accompany each company’s proposal to procure at least five MWh of energy storage by 2020.

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

NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PEITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Adam Schultz, Oregon Department of Energy, (503)-373-2125, 550 Capitol Street NE, Salem, OR 97301 and Wendy Simons, Oregon Department of Energy, wendy.simons@oregon.gov, (503) 378-6043, 550 Capitol Street NE, Salem, OR 97301

Based on the information provided above in accordance with the Commission’s rules of procedure, ODOE requests to participate in the 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.

/s/ Jesse D. Ratcliffe

November 17, 2017

Petitioner or Petitioner’s Representative

Date