1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UE 300		
3	In the Matter of,		
4	PORTLAND GENERAL ELECTRIC		
5	COMPANY, PETITION TO INTERVENE		
6	Investigation of Advice No. 15-09		
7			
8	Oregon Department of Transportation ("ODOT" as the "Department"). In this proceeding		
9	pursuant to Oregon Administrative Rule (OAR) 860-001-0300. In support of this petition, ODOT		
10	provides the following:		
11	1. The name and address of the Company is:		
12	Oregon Department of Transportation Heather C. Howe		
13	State Utility and Railroad Liasion,		
14	Technical Services Branch 4040 Fairview Industrial Dr. SE, MS#2		
15	Salem, OR 97302-1142 503-986-3658		
16	heather.c.howe@state.or.us		
17	2. The contact information of the persons to be included on the official service list in		
18	this proceeding are:		
19	Lucinda D. Jackson		
20	David B. Hatton Senior Assistant Attorney General		
21	Oregon Department of Justice 1162 Court Street NE		
22	Salem, OR 97301-4096 503-947-4530		
23	lucinda.d.jackson@doj.state.or.us david.hatton@doj.state.or.us		

Page 1 – PETITION TO INTERVENE (UE 300) LDJ:bw1/6873344-v1

1	3.	If the petitioner is an organization the number of members and the purposes of the	
2	organization:		
3		The Department is the state agency that has authority to designate where lines, fixtures and facilities may be located on roads within its jurisdiction.	
4		ORS 750.010(2).	
5	4.	The nature and extent of the petitioner's interest in the proceeding is:	
-		The Department has an interest in how costs may be allocated for the relocation of utility facilities within the state's right-of-way.	
7			
8	5.	The issues the Petitioner intends to raise in the proceeding:	
	The Department will raise issues to ensure that the tariff complies with the well-settled common law rule that utilities are required to bear the entire cost of relocating from or		
10	· · · · · · · · · · · · · · · · · · ·		
11	6.	The special knowledge or expertise of the Petitioner that would assist the	
12	commission in resolving the issues in the proceeding:		
13		ODOT constructs and maintains the state's highways and has many decades of experience dealing with utility facilities relocation on the state's right-of-way.	
14	ODOT's participation in this proceeding will not unreasonably broaden the is burden the record, or delay the proceeding.		
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## Page 2 – PETITION TO INTERVENE (UE 300) LDJ;bw1/6873344-v1

1	Based on the foregoing reasons, ODOT respectfully requests that the Commission grant the	
2	Petitioner to intervene.	
3	DATED this $\frac{21}{3}$ day of October 2015.	
4		Respectfully submitted,
5		ELLEN F. ROSENBLUM
6		Attorney General
7		Kuunda &. Jackson
8		Lucinda D. Jackson, OSB#862519 David B. Hatton, OSB#751517
9		Senior Assistant Attorney General Of Attorneys for the Oregon Department of
10		Transportation, State of Oregon lucinda.d.jackson@doj.state.or.us
11		david.hatton@doj.state.or.us
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## Page 3 – PETITION TO INTERVENE (UE 300) LDJ:bw1/6873344-v1

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## CERTIFICATE OF SERVICE

2.	I hereby certify that on the $\frac{2/5}{day}$ day of October 2015, I served a copy of the foregoing

3 by causing a copy thereof to be sent by electronic mail to the parities listed below.

4		
	dockets@oregoncub.org	
5	efiling@nwnatural.com	
	oregondockets@pacificorp.com	
6	greg@richardsonadams.com	
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-	gbass@noblesolutions.com '	
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17	Marvin.Hoffmam@state.or.us	
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18		
		PI Odli -
19		Darbarn Packing
		Barbara J. Watkins, Legal Secretary to
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