

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 300

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Investigation of Advice No. 15-09

City of Salem's Petition to Intervene

The City of Salem, Oregon, 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:
Company: City of Salem
Street Address: 555 Liberty St SE
City, State, Zip: Salem, Oregon 97301
Email Address:
Telephone:

2. The petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Ryan Sudbury
Company: City of Salem - City Attorney's Office
Street Address: 555 Liberty St SE, Room 205
City, State, Zip: Salem, Oregon 97301
Email Address: rsudbury@cityofsalem.net
Telephone: 503-588-6287

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

List of Members attached

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

The City of Salem owns and manages hundreds of miles of rights-of-way within the City's limits. PGE's facilities are located throughout the City's rights-of-way. The PUC's decision in this matter has the potential to affect the City's management and regulation of its rights-of-way and increase costs to the City and the City's residents.

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

The City is concerned with the manner in which costs are allocated for the relocation of PGE's facilities within the public right-of-way.

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

The City's Public Works Department has managed the public rights-of-way within the City limits for many years. The City will provide information on how the current program operates, and how public and private construction projects may be impacted by changes in the tariff sheets.

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.

/s/ Ryan Sudbury
Petitioner or Petitioner's Representative

10-2-15
Date Signed

CERTIFICATE OF SERVICE

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I certify that, on this day, I hereby caused to be served the foregoing document upon all parties of record in this proceeding by mailing a copy by electronic mail pursuant to OAR 860- 001-0180, to the following parties or attorneys of parties.

Dated this 2nd day of October, 2015, at Salem, Oregon.

/s/ Ryan Sudbury
Assistant City Attorney
City of Salem
555 Liberty St SE, Room 205
Salem, OR 97301