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December 5, 2012

**VIA ELECTRONIC FILING**  
**AND FIRST CLASS MAIL**

Public Utility Commission of Oregon  
550 Capitol Street N.E., Suite 215  
Salem, Oregon 97301-2551

Re: Troutdale Energy Center Petition to Intervene  
(Portland General Electric, Docket UM 1535)

Dear Filing Center:

Enclosed for filing please find an original and one (1) copy of Troutdale Energy Center's Petition to Intervene.

Respectfully submitted,

/s/ Chad Stokes

Chad M. Stokes

Enclosures

cc w/encs: UM 1535 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1535**

In the Matter of PORTLAND GENERAL  
ELECTRIC COMPANY Request for  
Proposals for Capacity and Baseload  
Energy Resources.

TROUTDALE ENERGY CENTER,  
LLC's PETITION TO INTERVENE  
  
and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300, and the Administrative Law Judge's ("ALJ") Prehearing Conference Memorandum of April 15, 2012, Troutdale Energy Center, LLC ("TEC") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(7). In support of this Petition, TEC states as follows:

1. The name and address of Troutdale Energy Center as a party of record in this proceeding is:

Troutdale Energy Center  
c/o Robert C. Howard  
Development Partners  
11 Martine Avenue, 9th floor  
White Plains, NY 10606  
Telephone: (914) 468-2406  
E-Mail: bhoward@developmentpartners.com

Chad M. Stokes from the law firm Cable Huston Benedict Haagensen & Lloyd and Paula E. Pyron will represent TEC in this proceeding. All documents related to this proceeding should be served on TEC's attorneys at the following address:

Chad M. Stokes  
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2. TEC is a developer actively working to site multiple generation facilities within Portland General Electric's ("PGE") service territory. TEC is also a bidder that responded to PGE's Request for Proposals ("RFP") that is at issue in this docket.

3. As a bidder, TEC plans to actively monitor the proceedings in this docket and, if necessary, raise issues that will be helpful to the Commission.<sup>1</sup> TEC also has expertise in issues relevant to PGE's RFP and TEC's participation in this proceeding will assist the Commission in resolving issues that may arise in this proceeding. TEC's participation will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding. As a bidder, no other party in this proceeding represents TEC's interests.

4. TEC waives paper service of documents in this proceeding.

5. The ALJ's Prehearing Conference Memorandum originally requested that all petitions for intervention be submitted by May 12, 2012. However, the memorandum also noted that ORS 756.525 provides that a person may petition to intervene at any time before the close of

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<sup>1</sup> TEC previously submitted a letter to the Commission asking for a hearing to ensure that the bidder responses are scored in a manner that is accurate and that maintains ratepayers' best interests. In Order No. 12-398, the Commission deemed TEC's request for a hearing as a motion to reconsider Order No. 12-215, the order that approved the final version of PGE's RFP with conditions.

the record. The record has not yet closed in this matter. Intervention at this time is therefore still appropriate, as the ALJ has acknowledged through the grant of other similar petitions.

WHEREFORE, Troutdale Energy Center respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 5th day of December 2012.

Respectfully submitted,

/s/ Chad M. Stokes

Chad M. Stokes, OSB No. 004007

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/s/ Paula Pyron

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Of Attorneys for the  
Troutdale Energy Center

## CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing *Troutdale Energy Center Petition to Intervene* in UM 1535 via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

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Dated in Portland, Oregon, this 5<sup>th</sup> day of December 2012.

/s/ Chad M. Stokes

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