

DEPARTMENT OF JUSTICE

GENERAL COUNSEL DIVISION

April 11, 2011

Attention: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, #215
PO Box 2148
Salem, OR 97308-2148
puc.filingcenter@state.or.us

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Portland General

Electric Company's Request for Proposals for Capacity Resources

PUC Docket No.: UM 1535

DOJ File No.: 330-030-GN0093-11

Enclosed are an original and one copy of Petition to Intervene in the above-captioned matter for filing with the PUC for today.

Sincerely,

Janet L. Prewitt

Senior Assistant Attorney General

Natural Resources Section

and L. Reurt

Enclosure
JLP:mme/#2639661
c: UM 1535 Service List
Vijay A. Satyal, ODOE
Matt Krumenauer, ODOE

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1535

In the Matter of the)	
PUBLIC UTILITY COMMISSION OF OREGON)	
Portland General Electric Company's Request for Proposals for Capacity Resources)	PETITION TO INTERVENE

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: vijay.a.satyal@state.or.us

matt.krumenauer@state.or.us

NAME OF COUNSEL FOR PETITIONER: Janet L. Prewitt, Senior Assistant Attorney General

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

COUNSEL'S PHONE NUMBER: (503) 947-4500

COUNSEL'S FAX NUMBER: (503) 378-3802

COUNSEL'S E-MAIL ADDRESS: janet.prewitt@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).

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING: Unknown at this time.

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 REPRESNTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Vijay A. Satyal, Oregon Department of Energy, vijay.a.satyal@state.or.us, (503) 378-4040, 625 Marion Street N.E., Salem, OR 97301-3737. Matt Krumenauer, Oregon Department of Energy, matt.krumenauer@state.or.us, (503) 378-4040, 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.

Petitioner or Petitioner's Representative

April 11, 2011

SERVICE LIST UM 1535

W Gregory M. Adams (Confidential) Richardson & O'Leary greg@richardsonandoleary.com	W Kelcey Brown (Confidential) OPUC kelcey.brown@state.or.us	W Patrick Hager PGE 121 SW Salmon St. – pge.opuc.filings@pgn.com
W Robert D. Kahn NIPPC rkahn@nippc.org rkahn@rdkco.com	W Matt Krumenauer ODOE matt.krumenauer@state.or.us	W Peter J. Richardson (Confidential) Richardson O'Leary PLLC peter@richardsonandoleary.com
W Irion A. Sanger Davison Van Cleve mail@dvclaw.com	W Vijay A. Satyal ODOE vijay.a.satyal@state.or.us	W V. Denise Saunders PGE denise.saunders@pgn.com
W Donald W. Schoenbeck Regulatory & Cogeneration Services Inc. dws@r-c-s-inc.com	W S. Bradley Van Cleve Davison Van Cleve PC mail@dvclaw.com	

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April 2011, I served the foregoing PETITION TO INTERVENE upon the persons named on the service list, by mailing a full, true and correct copy thereof and to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

DATED: April 11, 2011

anet L. Prewitt, #853070

Senior Assistant Attorney General