JOHN R. KROGER Attorney General



MARY H. WILLIAMS Deputy Attorney General

**DEPARTMENT OF JUSTICE** GENERAL COUNSEL DIVISION

January 18, 2012

Attention: Filing Center Public Utility Commission of Oregon 550 Capitol Street NE, #215 P.O. Box 2148 Salem, OR 97301-2148 Puc.filingcenter@state.or.us

Re: In the Matter of the PUBLIC UTILITY COMMISSION OF OREGON Investigation of Fuel Switching and Cross Fuel Energy Efficiency Issues OPUC Docket No.: UM 1565 DOJ File No.: 330-030-GN0019-12

Enclosed for filing with the Commission today are an original and one copy of the Oregon Department of Energy's (ODOE) Petition to Intervene in the above-captioned matter.

Sincerely,

and L. Switt Janet L. Prewitt

Assistant Attorney General Natural Resources Section

Enclosures JLP:jrs/#3176363 c: UM 1565 Service List Vijay Satyal, ODOE (electronic copy only)

Maureen P. Bock, ODOE (electronic copy only)

## **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

#### UM 1565

In the Matter of	)	
the PUBLIC UTILITY COMMISSION OF OREGON	) ) )	PETITION TO INTERVENE
Investigation of Fuel Switching and Cross Fuel Energy Efficiency Issues	) ) )	

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: <u>vijay.a.satyal@state.or.us</u> maureen.p.bock@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) 947-4342

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

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, <u>vijay.a.satyal@state.or.us</u>, (503) 378-0008, 625 Marion Street N.E., Salem, OR 97301-3737. Maureen P. Bock, Oregon Department of Energy, <u>maureen.p.bock@state.or.us</u>, (503) 934-4004, 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

January 18, 2012

# UM 1565 Service List

UM 1565 Service List		
W=Waive Paper service W	W	
OPUC Dockets	Oregon Dockets	
Citizens' Utility Board of Oregon	Pacificorp, dba Pacific Power	
610 SW Broadway, Ste 400	825 NE Multnomah St, Ste 2000	
Portland OR 97205	Portland OR 97232	
dockets@oregoncub.org	oregondockets@pacificorp.com	
W	W	
E-Filing	Jim Abrahamson	
Northwest Natural	<b>Cascade Natural Gas Corporation</b>	
220 NW 2nd Ave	8113 W. Grandridge Blvd	
Portland OR 97209	Kennewick WA 99336	
efiling@nwnatural.com	jim.abrahamson@enge.com	
W	W	
Shawn Bonfield	Terri Bowman	
Avista Utilities	Portland General Electric	
PO Box 3727	121 SW Salmon St, 1WTC0702	
Spokane WA 99220-3727	Portland OR 97204	
shawn.bonfield@avistacorp.com	pge.opuc.filings@pgn.com	
W	W	
Gordon Feighner	Wendy Gerlitz	
Citizens' Utility Board of Oregon	NW Energy Coalition	
610 SW Broadway, Ste 400	1205 SE Flavel	
Portland OR 97205	Portland OR 97202	
gordon@oregoncub.org	wendy@nwenergy.org	
W	W	
Linda Gervais	Jennifer Gross	
Avista Utilities	Northwest Natural	
PO Box 3727	220 NW 2nd Avenue	
Spokane WA 99220-3727	Portland OR 97209	
linda.gervais@avistacorp.com	jennifer.gross@nwnatural.com	
W	W	
Juliet Johnson	Don Jones	
Public Utility Commission	Pacific Power	
PO Box 2148	825 NE Multnomah	
Salem OR 97308-2148	Documentation Center	
juliet.johnson@state.or.us	Portland OR 97232	
	jr_don.jones@pacificorp.com	

# UM 1565 Service List (cont.)

W Steve Lacey Energy Trust of Oregon 851 SW 6th Ave, Ste 1200 Portland OR 97204 steve.lacey@energytrust.org	W G. Catriona McCracken <b>Citizens' Utility Board of Oregon</b> 610 SW Broadway, Ste 400 Portland OR 97205 <u>catriona@oregoncub.org</u>
W David J. Meyer Avista Corporation PO Box 3727 Spokane WA 99220-3727 david.meyer@avistacorp.com	W Johanna Riemenschneider <b>PUC Staff - Department Of Justice</b> Business Activities Section 1162 Court St NE Salem OR 97301-4796 johanna.riemenschneider@state.or.us
W Allison Spector <b>Cascade Natural Gas</b> 1600 Iowa St Bellingham WA 98229 <u>allison.spector@cngc.com</u>	W Douglas C. Tingey <b>Portland General Electric</b> 121 SW Salmon 1WTC13 Portland OR 97204 <u>doug.tingey@pgn.com</u>
W David Tooze City of Portland Planning & Sustainability 1900 SW 4th Ste 7100 Portland OR 97201 david.tooze@portlandoregon.gov	W John M. Volkman Energy Trust of Oregon 851 SW 6th Ave Suite 1200 Portland OR 97204 john.volkman@energytrust.org
W Benjamin Walters <b>City of Portland</b> <b>City Attorney's Office</b> 1221 SW 4th Ave - Rm 430 Portland OR 97204 <u>ben.walters@portlandoregon.gov</u>	W Karla Wenzel <b>Portland General Electric</b> 121 SW Salmon St. 1WTC0702 Portland OR 97204 <u>karla.wenzel@pgn.com</u>
W Mary Wiencke Pacific Power 825 NE Multnomah St, Ste 1800 Portland OR 97232-2149 mary.wiencke@pacificorp.com	

### CERTIFICATE OF SERVICE

I hereby certify that on the 18<sup>th</sup> day of January 2012, 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: January 18, 2012

Janet L. Prewitt, OSB #853070 Senior Assistant Attorney General