BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1565

In the Matter of)
PUBLIC UTILITY COMMISSION OF OREGON)) FOREFRONT ECONOMICS) PETITION TO INTERVENE
Investigation into Fuel Switching and) AND WAIVER OF PAPER) SERVICE
Cross Fuel Efficiency)
)

Pursuant to ORS 756.525 and OAR 860-012-0001, Forefront Economics petitions to intervene in UM 1565, Investigation of Fuel Switching and Cross Fuel Efficiency. In support of this petition, Forefront Economics states:

1.

Forefront Economics is a consulting firm that preforms economic evaluations specific to the delivery of utility service including but not limited to demand side management ("DSM") cost effectiveness tests and DSM program impact evaluations.

2.

Communications to Forefront Economics concerning this proceeding should be addressed to:

Mark Thompson
President, Forefront Economics
3800 SW Cedar Hills Blvd.
Suite 285
Beaverton, Oregon 97005
mark@forecon.com
(503) 626-1657

3.

Forefront Economics has a direct and substantial interest in this proceeding.

Forefront Economics prepared for NW Natural the white paper that studied the energy

savings and costs of replacing an existing gas furnace in a single family home with either

a high efficiency natural gas furnace or a high efficiency electric heat pump. This study

was cited in Staff's memo to the Commission, dated November 29, 2011, wherein Staff

asked the Commission to open the investigation.

Forefront Economics participation in this proceeding will assist the Commission

in resolving the issues before it and will not unreasonably broaden the issues, burden

the record or unreasonably delay the proceedings.

5.

Forefront Economics hereby waives service by means other than service by

electronic mail.

WHEREFORE, Forefront Economics respectfully requests that the Commission

grant this petition to intervene.

DATED: January 25, 2012

FOREFRONT ECONOMICS

/s/ Mark Thompson

Mark Thompson

President, Forefront Economics

January 25, 2012

Public Utility Commission of Oregon Attn: Filing Center 550 Capitol Street NE, Suite 215 PO Box 2148 Salem, Oregon 97308-2148

Re: DOCKET UM 1565: Investigation into Fuel Switching and Cross Fuel

Efficiency

Petition to Intervene

Enclosed please find Forefront Economics' Petition to Intervene in the above-referenced docket.

Please call me at (503) 626-1657 if you have any questions.

Sincerely,

/s/ Mark Thompson

Mark Thompson President, Forefront Economics 3800 SW Cedar Hills Blvd. Suite 285 Beaverton, Oregon 97005

enclosures

cc: UM 1565 Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing PETITION TO INTERVENE OF FOREFRONT ECONOMICS in Docket No. UM 1565 upon each party listed below by electronic mail.

PacifiCorp (DBA Pacific Power)

Oregon Dockets

oregondockets@pacificorp.com

Pacific Power Don Jones

jr_don.jones@pacificorp.com

Department of Justice Johanna Riemenschneider Business Activities Section

johanna.riemenschneider@state.or.us

Pacific Power Mary Wiencke

mary.wiencke@pacificorp.com

NW Energy Coalition Wendy Gerlitz wendy@nwenergy.org Public Utility Commission Juliet Johnson

juliet.johnson@state.or.us

NW Natural Jennifer Gross

jennifer.gross@nwnatural.com

NW Natural Efiling

efiling@nwnatural.com

Portland General Electric

Karla Wenzel

karla.wenzel@pgn.com

City of Portland

Planning and Sustainability

Dave Tooze

david.tooze@portlandoregon.gov

City of Portland

Planning and Sustainability

Ben Walters

Ben.walters@portlandoregon.gov

Portland General Electric Douglas C. Tingey

Assistant General Counsel doug.tingey@pgn.com

Citizens' Utility Board of Oregon

OPUC Dockets

dockets@oregoncub.org

Citizens' Utility Board of Oregon

GORDON FEIGHNER gordon@oregoncub.org

Portland General Electric

Terri Bowman

terri.bowman@pgn.com

Citizens' Utility Board of Oregon Cascade Natural Gas G. Catriona McCracken Jim Abrahamson

jim.abrahamson@cngc.com

Energy Trust of Oregon

Steve Lacey

steve.lacey@energytrust.com

Cascade Natural Gas Allison Spector

allison.spector@cngc.com

catriona@oregoncub.org

Oregon Dept. of Energy Maureen Bock

maureen.p.bock@state.or.

...

Energy Trust of Oregon John Volkman General Counsel

john.volkman@energytrust.com

Oregon Dept. of Energy

Vijay Satyal

vijay.a.satyal@state.or.us

Oregon Dept. of Justice

Janet Prewitt

janet.prewitt@doj.state.or.us

Avista Corporation Linda Gervais

Sr Regulatory Analyst linda.gervais@avistacorp.com

Avista Corporation David J Meyer

Vice President and Chief Counsel david.meyer@avistacorp.com

Avista Corporation Shawn Bonfield

shawn.bonfield@avistacorp.com

DATED this 26TH Day of January 2012

Respectfully submitted,

/s/ Mark Thompson
Forefront Economics
President, Forefront Economics
3800 SW Cedar Hills Blvd
Suite 285
Beaverton, Oregon 97005

(503) 626-1657