

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1565

In the Matter of

Investigation into Fuel Switching
and Cross-Fuel Efficiency Issues

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PETITION TO INTERVENE

NAME OF PETITIONER:	City of Portland, Oregon, attn: David Tooze
ADDRESS:	Bureau of Planning and Sustainability 1900 SW 4th Avenue Room 7100 Portland, OR 97201
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NAME OF COUNSEL FOR PETITIONER:	Benjamin Walters
COUNSEL'S ADDRESS:	City Hall Room 430, 1221 SW Fourth Avenue Portland, Oregon 97204
COUNSEL'S PHONE NUMBER:	503-823-4047
COUNSEL'S FAX NUMBER:	503-823-3089
COUNSEL'S E-MAIL ADDRESS:	ben.walters@portlandoregon.gov

**IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN
AND THE PURPOSES OF THE ORGANIZATION:**

The City of Portland is a municipal corporation duly organized and existing under the laws of the State of Oregon. The City of Portland's home rule charter contains a broad grant of authority of all governmental powers, including the power commonly known as the police power, and to do any act necessary or appropriate to carry out such power. The City represents the residents and electorate of the City, as well as the numerous businesses that are located and operate within the City to oversee the activities of utilities within its boundaries.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

The Commission has initiated this proceeding to investigate questions about fuel switching as related to energy efficiency incentives, including designs for incentives for space and water heating equipment, and issues of cost effectiveness from the customer and whole utility system perspective.

The City of Portland's 2009 Climate Action Plan establishes short- and long-term goals for carbon reduction. These goals are influenced by the emissions from generating electricity and use of natural gas. The City of Portland is pursuing multiple policy and regulatory avenues to address carbon reduction. For example, the City has cooperated with Multnomah County, the Energy Trust of Oregon, NW Natural, Portland General Electric and Pacific Power in establishing the Clean Energy Works program, to promote energy savings through low-interest financing to qualified homeowners to improve the energy efficiency of their homes. The policy decisions made in this proceeding may affect the City's goals and policies.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The City of Portland intends to monitor and participate in this proceeding. If necessary, the City of Portland may raise issues as appropriate to this proceeding. The City of Portland's participation in this proceeding will assist the Commission in resolving the issues in this proceeding. The City of Portland will bring a unique perspective to this proceeding. No other party can adequately represent the City of Portland's interests in this proceeding.

The City of Portland will not unreasonably broaden the issues, burden the record or unreasonably delay the proceedings.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The City of Portland has participated as a party in numerous dockets and matters before the Commission. The City of Portland brings a unique perspective to this proceeding. For example, the City of Portland's development of its Climate Action Plan gives both staff expertise and a community perspective on the carbon impact of fossil fuels.

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 860-012-0001.

Benjamin Walters Chief Deputy City Attorney *January 12, 2012*
Petitioner or Petitioner's Representative Date

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing City of Portland's Petition to Intervene

on:

PUBLIC UTILITY COMMISSION OF OREGON
ATTN: FILING CENTER
550 CAPITOL ST NE #215
PO BOX 2148
SALEM OR 97308-2148

on the 12th day of January, 2012, by electronic copy to e-mail address

PUC.FilingCenter@state.or.us and by mailing the original and one copy of said document, contained in a sealed envelope with postage paid, and deposited in the post office at Portland, Oregon on said day to the address listed above.

I further certify that I served a copy of the foregoing City of Portland's Petition to Intervene on the individuals on the attached Service List by electronic mail this date.

DATED this 12th day of January, 2012.

/s/ Benjamin Walters

Benjamin Walters, OSB #85354
Chief Deputy City Attorney
Attorneys for City of Portland

UM 1565- SERVICE LIST

**W=Waive Paper
service**

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