

**CHRIS ROBERTSON & ASSOCIATES, LLC**

Business and Policy Advisors  
Energy Efficiency, Renewable Energy, Climate Strategy  
People + Planet + Profits

3707 NE16th Avenue, Portland, Oregon 97212  
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<http://www.chrisrobertsonassociates.com>

December 19, 2013

***Via Electronic Filing***

Oregon Public Utility Commission  
ATTN: Filing Center  
3930 Fairview Industrial Drive SE  
PO Box 1088  
Salem OR 97308-1088

RE: UM 1673 – In the matter of Public Utility Commission of Oregon, Report to the Legislature on the Effectiveness of Incentive Programs for Solar Photovoltaic Energy

Dear Filing Center:

An original and one copy of the following documents has already been sent to the Filing Center by US Postal Service:

Chris Robertson & Associates, LLC's:

- Petition to Intervene
- Certificate of Service

Attached to this cover letter please find Chris Robertson & Associates Petition to Intervene and Certificate of Service. All documents were sent to the UM 1673 service list on December 19, 2013.

Thank You.

Sincerely,



Chris Robertson

CNR:s  
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

UM 1673

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Report to the Legislature on  
Effectiveness of Incentive Programs for  
Solar Photovoltaic Energy

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PETITION TO INTERVENE  
OF CHRIS ROBERTSON &  
ASSOCIATES, LLC

Chris Robertson petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The name and address of petitioner are:

Chris Robertson & Associates, LLC  
Chris Robertson, Principal  
3707 NE 16<sup>th</sup> Avenue  
Portland, OR 97212

2. Petitioner will be represented by:

Chris Robertson  
3707 NE 16<sup>th</sup> Avenue  
Portland, OR 97212  
503-381-7812  
cnrobertson@comcast.net

Please include this contact information on the service list. Chris Robertson & Associates waives paper service

3. If petitioner is an organization, the number of members and purposes of the organization.

Chris Robertson & Associates, LLC is a sole proprietor LLC organized in the State of Oregon. Purpose is to do business with a primary focus on energy and environmental strategy.

4. The nature and extent of Petitioner's interest in the proceeding:

Petitioner intends to comment on the design of incentive and business models, market research on PV pricing, the reasonableness of planning assumptions, and considerations in future program design.

5. The issues Petitioner intends to raise in the proceeding are:

PV pricing in future years, appropriate scale of PV programs, market barriers and their possible solutions, the role of the utility in enabling a large-scale solar resource, and the shift from PV as an expensive resource to one that is cost-effective against avoided costs.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving issues in this docket:

Chris Robertson & Associates, LLC has been engaged in the design of business strategies and policy recommendations in the energy efficiency and renewable energy sectors for more than 20 years. Chris Robertson authored the April 2013 report for the Solar Energy Industries Association, their *Vision to Integrate Solar in Oregon*, which was published in April 2013. In December 2013 Chris Robertson published the *Solar Plan for Oregon*, a scenario based planning approach to defining a large-scale solar resource in Oregon.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Chris Robertson & Associates, LLC requests to participate in this proceeding as an intervener. I, or the organization I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceedings.

DATED this 19<sup>TH</sup> day of December

/s/ Chris Robertson

Chris Robertson & Associates, LLC representative

Chris Robertson  
3707 NE 16<sup>th</sup> Avenue  
Portland, OR 97212  
503-381-7812  
[cnrobertson@comcast.net](mailto:cnrobertson@comcast.net)

## UM 1673 – CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Petition to Intervene of Chris Robertson & Associates, LLC to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class Mail, postage prepaid and properly addressed, to those parties on the service list who have not waived paper service from Docket No. UM 1673.

DATED this 19<sup>th</sup> day of December, 2013.



Chris Robertson, Principal  
Chris Robertson & Associates, LLC

### Service List UM 1673

<b>W</b>	<b>*OREGON DEPARTMENT OF ENERGY</b>	
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