ELLEN F. ROSENBLUM Attorney General



FREDERICK M. BOSS Deputy Attorney General

DEPARTMENT OF JUSTICE GENERAL COUNSEL DIVISION

February 12, 2014

Attention: Filing Center Public Utility Commission of Oregon 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, OR 97308-1088 puc.filingcenter@state.or.us

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, 2015-2019 Renewable Portfolio Standard Implementation Plan PUC Docket UM 1683 DOJ File No.: 330030-GN0039-14

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

Sincerely, Renee M France

Senior Assistant Attorney General Natural Resources Section

Enclosures RMF:jrs/#4972791 (Electronic copies only) c: UM 1683 service list

Kacia Brockman, Oregon Department of Energy Julie Peacock, Oregon Department of Energy

## **BEFORE THE PUBLIC UTILITY COMMISSION**

#### OF OREGON

#### UM 1683

In the Matter of	)	
PORTLAND GENERAL ELECTRIC COMPANY	) ) )	PETITION TO INTERVENE
2015-2019 Renewable Portfolio Standard Implementation Plan	) ) )	

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: kacia.brockman@state.or.us julie.peacock@state.or.us

NAME OF COUNSEL FOR PETITIONER: Renee M. France, Senior Assistant Attorney General

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

COUNSEL'S PHONE NUMBER: (503) 947-4520

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

COUNSEL'S E-MAIL ADDRESS: renee.m.france@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).

# 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: Kacia Brockman, Oregon Department of Energy, kacia.brockman @state.or.us, (503) 373-7955, 625 Marion Street N.E., Salem, OR 97301-3737 and Julie Peacock, Oregon Department of Energy, julie.peacock@state.or.us, (503) 373-2125, 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.

2/12/14 nee Fray

Petitioner or Petitioner's Representative

#### CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2014, I served the foregoing PETITION TO

INTERVENE upon the persons named on the service list, by electronic mail only as all

parties have waived paper service.

OPUC Dockets Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400 Portland OR 97205 dockets@oregoncub.org

Ryan Bracken (C) Public Utility Commission of Oregon PO Box 1088 Salem OR 97308-1088 ryan.bracken@state.or.us

J. Richard George (C) Portland General Electric Company 121 SW Salmon Street 1WTC1301 Portland OR 97204 richard.george@pgn.com

G. Catriona McCracken (C) 610 SW Broadway, Suite 400 Portland OR 97205 catriona@oregoncub.org

(C) = Confidential

PGE Rates & Regulatory Affairs Portland General Electric Company 121 SW Salmon Street, 1WTC0702 Portland OR 97204 pge.opuc.filings@pgn.com

Rebecca T. Brown (C) Portland General Electric 121 SW Salmon Street 1WTC 07 Portland OR 97204 rebecca.brown@pgn.com

Robert Jenks (C) Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400 Portland OR 97205 bob@oregoncub.org

Bradley Mullins (C) Mountain West Analytics 333 SW Taylor, Suite 400 Portland OR 97204 brmullins@mwanalytics.com RNP Dockets Renewable Northwest Project 421 SW 6<sup>th</sup> Ave., Suite 1125 Portland OR 97204 dockets@rnp.org

Megan Walseth Decker (C) Renewable Northwest Project 421 SW 6<sup>th</sup> Ave #1125 Portland OR 97204-1629 megan@rnp.org

Jason W. Jones (C) PUC Staff--Department of Justice Business Activities Section 1162 Court Street NE Salem OR 97301-4096 jason.w.jones@state.or.us

Irion A. Sanger (C) Davison Van Cleve 333 SW Taylor - Suite 400 Portland OR 97204 ias@dvclaw.com

Renee M. France, OSB #004472 Senior Assistant Attorney General