

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

September 2, 2015

VIA ELECTRONIC MAIL ONLY

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of* NORTHWEST NATURAL GAS COMPANY, Application for Approval
of an Emission Reduction Program
OPUC Docket No.: UM 1744
DOJ File No.: 330030-GN0270-15

Filing Center:

Enclosed for filing with the Commission today is 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/#6765743
c: Jessica Shipley, ODOE
Wendy Simons, ODOE

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1744

In the Matter of)
)
NORTHWEST NATURAL GAS) PETITION TO INTERVENE
COMPANY,)
)
Application for Approval of an Emission)
Reduction Program)

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: jessica.shipley@state.or.us
wendy.simons@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).

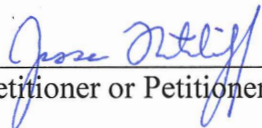
ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

See description of the ODOE's interest, above.

NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Jessica Shipley, Oregon Department of Energy, jessica.shipley@state.or.us, (503) 378-3780, 625 Marion Street N.E., Salem, OR 97301-3737 and Wendy Simons, Oregon Department of Energy, wendy.simons@state.or.us, (503) 378-6043, 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

9/2/15

Date