

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No.

In the Matter of

UM 1787

PETITION TO INTERVENE

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

1. The contact information (name, address, email address) of the petitioner is:

Name: Keith Kueny
Company: Community Action Partnership of Oregon
Street Address: 350 Mission SE
City, State, Zip: Salem, OR 97302
Email Address: keith@caporegon.org
Telephone: 5039919327

Please include this contact on the service list.

2a. The petitioner will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Janet Merrell
Company: Community Action Partnership of Oregon
Street Address: 350 Mission SE
City, State, Zip: Salem, OR 97302
Email Address: janet@caporegon.org
Telephone: 5038309969

Name:
Company:
Street Address:
City, State, Zip:
Email Address:

Telephone:

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

Community Action Partnership of Oregon (CAPO) is a non-profit association that serves the agencies that serve Oregonians in need. These agencies are Community Action Agencies (CAAs), part of a nationwide poverty-fighting network. CAPO comprises 18 member organizations (17 CAAs and Oregon Human Development Corporation), serving Oregonians in every county in the state.

Together, the CAAs provide services to eradicate poverty in the state of Oregon. We work in collaboration with a variety of partners, representing local, state and federal governments, as well as community and advocacy groups, policymakers and low-income leaders.

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

Currently, CAPO member organizations deliver federal, state, and local energy assistance and weatherization programs. These programs include: LIHEAP, OEAP, DOE weatherization, ECHO, and many others. CAPO has a significant role in delivering energy assistance services, and any change to the present model would impact agency policy and program delivery.

OEAP is a voluntary energy assistance programs that help eligible households pay their heating bills. Oregon Residents with household income within 60% of Oregon statewide median income guidelines that are living within PGE and Pacific Power territory.

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

CAPO is interested in whether the current OEAP delivery model is more or less effective than monthly payments structured under a percentage of income payment program. Additionally, CAPO has several questions that would need to be answered during any docket proceedings. These include: Would a PIPP be too administratively burdensome and not cost-effective in its delivery? What level of funding would support every qualified Oregonian being enrolled into the PIPP program? How would low-income be defined and how would these client's income be verified to qualify into the program?

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

CAPO has a special knowledge related to delivering energy assistance program. Staff regularly work with low-income clients to deliver the best-quality services to assist Oregonians out of poverty.

7. 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 860-001-0300.

Petitioner or Petitioner's Representative

A handwritten signature in black ink, appearing to read "Keith Kueny", with a stylized flourish at the end.

Keith Kueny

Date Signed

7-11-16