

March 14, 2007

Public Utility Commission of Oregon Attention: Filing Center 550 Capitol Street NE, Suite 215 P.O. Box 2148 Salem, OR 97301-2148 PUC.FilingCenter@state.or.us

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY's Request to

Add Schedule 111, Advanced Metering Infrastructure (AMI)

PUC Docket No. UE 189

DOJ File No. 330-030-GN0879-07

Enclosed are an original and five copies of Petition to Intervene in the above-captioned matter for filing with the PUC today.

Sincerely,

/s/ Janet L. Prewitt

Janet L. Prewitt Assistant Attorney General Natural Resources Section

c: Robin Straughan, ODOE UE 189 Service List

JLP:jrs/GENT2633

### BEFORE THE PUBLIC UTILITY COMMISSION

### OF OREGON

UE 189

In the Matter of the	)	
	)	PETITION TO
PORTLAND GENERAL ELECTRIC	)	<b>INTERVENE</b>
COMPANY's	)	
	)	
Request to Add Schedule 111, Advanced	)	
Metering Infrastructure (AMI).	)	

NAME OF PETITIONER: Oregon Department of Energy

ADDRESS: 625 Marion Street NE, Salem, OR 97301-3742

PHONE NUMBER: (503) 378-4040

FAX NUMBER: (503) 373-7806

E-MAIL ADDRESS: robin.straughan@state.or.us

NAME OF COUNSEL FOR PETITIONER: Janet Prewitt

COUNSEL'S ADDRESS: Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096

COUNSEL'S PHONE NUMBER: (503) 947-4500

COUNSEL'S FAX NUMBER: (503) 378-3802

COUNSEL'S E-MAIL ADDRESS: janet.prewitt@doj.state.or.us

PLEASE SEND COPIES TO: Robin Straughan, Oregon Department of Energy, 625 Marion Street NE, Salem, OR 97301-3742.

# IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION: N/A

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

Under ORS 469.030, the Oregon Department of Energy 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).

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING: Unknown at this time.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING: See description of the Department of Energy's interest, above.

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 860-013-0021.

Pursuant to OAR 860-013-0070(4), the Petitioner hereby agrees to accept service by electronic mail and waives other forms of service provided in OAR 860-013-0073.

/s/ Janet L. Prewitt	March 14, 2007
Petitioner or Petitioner's Representative	Date

# SERVICE LIST (UE 189)

STEPHANIE S ANDRUS **DEPARTMENT OF JUSTICE** 

Regulated Utility & Business Section 1162 Court St NE Salem OR 97301-4096

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Jason Eisdorfer

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Robin Straughan

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# CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of March, 2007, I served the foregoing PETITION TO INTERVENE, upon, the persons named on the attached service list, by mailing a full, true and correct copy thereof addressed to the persons at the addresses on the service list.

DATED: March 14, 2007.

/s/ Janet L. Prewitt

Janet L. Prewitt, #85307 Assistant Attorney General