

## **DEPARTMENT OF JUSTICE**GENERAL COUNSEL DIVISION

June 30, 2015

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 IDAHO POWER COMPANY, Application to Lower Standard Contract

Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar Integration Charge, and for Change in Resource Sufficiency Determination

OPUC Docket No.: UM 1725 DOJ File No.: 330030-GN0192-15

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/#6617222

c: Diane Broad, ODOE Wendy Simons, ODOE

## BEFORE THE PUBLIC UTILITY COMMISSION

## **OF OREGON**

UM 1734

In the Matter of	)
PACIFICORP, dba PACIFC POWER's,	) PETITION TO INTERVENE
Application to Reduce the Qualifying Facility Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap.	

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: diane.broad@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:

The Department has an interest in opportunities and barriers to integrating small-scale renewable energy resources under the Public Utilities Regulatory Policy Act. This interest is supported by the state's goal to encourage a diverse array of sustainable energy sources under ORS 469.010. In addition, ODOE is interested in UM 1734 because it raises issues related to UM 1610 (Investigation into Qualifying Facility Contracting and Pricing), to which ODOE is a party.

Under ORS 469.030, the department is statutorily charged with the responsibility to study, evaluate and disseminate information about energy use in Oregon. The department's responsibilities include the preparation of a comprehensive energy plan under ORS 460.060. As part of these responsibilities, under ORS 469.060, the department 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, the department "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: Diane Broad, Oregon Department of Energy, diane.broad@state.or.us, (503) 373-4035, 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

Date