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September 5, 2017

VIA ELECTRONIC FILING

Oregon Public Utility Commission
Attn: PUC Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088

PUC.FilingCenter@state.or.us

**Re: UM 1892 – Portland General Electric’s Application for Waiver of the
Competitive Bidding Guidelines
*National Grid’s Petition to Intervene***

National Grid USA (“National Grid”) hereby files the enclosed “Petition to Intervene” in the above-referenced docket.

Please contact me with any questions.

Sincerely,

/s/ Chris Zentz

Chris Zentz

TROUTMAN SANDERS LLP

Attorney for National Grid USA

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1892

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Waiver of the Competitive
Bidding Guidelines.

NATIONAL GRID USA'S
PETITION TO INTERVENE

In accordance with ORS § 756.525 and OAR § 860-001-0300, National Grid USA (“National Grid”) petitions to intervene in this proceeding, and in support of this Petition, states as follows:

1. The contact information (name, address, e-mail address) for National Grid is:

National Grid USA
Attn: Nathan Sandvig
205 SE Spokane Street, Suite 300
Portland, OR 97202
Nathan.Sandvig@nationalgrid.com

2. The names and addresses of the persons to be included on the official service list in this docket are:

Nathan Sandvig
Director, Business Development
National Grid USA
205 SE Spokane Street, Suite 300
Portland, OR 97202
Phone: (503) 602-0998
Nathan.Sandvig@nationalgrid.com

Chris Zentz
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100 SW Main St., Suite 1000
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3. National Grid is a subsidiary of National Grid plc, a Fortune Global 500 company and one of the largest investor-owned energy companies in the world, with a market capitalization of

over \$50 billion. National Grid plc has utility operations in both the United Kingdom and the United States. National Grid is actively engaged in the development and operation of bulk transmission and bulk storage assets to enable the transition of the United States' electric system to a low-carbon grid.

4. As a company, National Grid is technology agnostic, and is considering various energy storage opportunities throughout the Western United States, including within the state of Oregon and in the service territory of Portland General Electric Company. Among other technologies, National Grid is interested in pumped storage hydroelectric projects and the ability of these environmentally-friendly projects to cost-effectively support grid reliability by providing an unparalleled array of services, including grid-scale services that allow for the reliable integration and economic optimization of the variable output from renewable energy resources.

5. National Grid is proud to be involved with the development of the two most promising pumped storage projects in the Pacific Northwest, the Swan Lake North Project in southern Oregon ("Swan Lake"), and the JD Pool Project in southern Washington ("JD Pool"). National Grid is jointly developing both of these projects with Rye Development, LLC. Both projects will utilize environmentally-friendly "closed-loop" technology, are located near high voltage transmission corridors, and will each be capable of providing unmatched flexibility as a resource, capable of serving multiple roles and providing stacked energy, capacity, and other reliability and economic benefits on a utility and/or regional basis.

6. National Grid has a substantial interest in this proceeding. National Grid seeks to participate in this proceeding to ensure that Portland General Electric's integrated resource planning ("IRP") process, and accompanying request for proposals, appropriately analyzes and

considers opportunities for investment in generation, transmission, and energy storage.

Furthermore, National Grid has been an active participant in Portland General Electric's current IRP proceeding before the Commission and, because the instant proceeding relates to the capacity need identified in the IRP proceeding, National Grid also has an interest in this proceeding.

7. National Grid intends to participate as a party in this proceeding to raise any pertinent issues.

8. National Grid has special knowledge and expertise that would assist the Commission in resolving the issues in this proceeding. National Grid has vast experience and expertise in balancing the electricity system and ensuring electric markets run efficiently, and this experience and expertise would provide a unique and important voice to this discussion.

9. Based on the information provided above, and in accordance with the Commission's rules of procedure, National Grid hereby requests to participate in this proceeding as an intervenor. National Grid will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See* OAR 860-001-0300.

10. National Grid therefore respectfully requests that the Commission grant its Petition to Intervene.

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Dated this 5th day of September, 2017.

Respectfully submitted,

A handwritten signature in blue ink that reads "Nathan Sandvig". The signature is written in a cursive style and is positioned above a horizontal line.

Nathan Sandvig
Director, Business Development
National Grid USA