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June 17, 2008

Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

Subject: In the Matter of Honeywell International, Inc., Honeywell Global Finance, LLC and Pacificorp, dba Pacific Power, DR 40

Dear Commissioners:

Please find enclosed Energy Trust of Oregon, Inc.'s Petition to Intervene in the declaratory ruling proceeding for which petition was filed jointly by Honeywell International, Inc., Honeywell Global Finance, LLC, and Pacificorp, dba Pacific Power on June 6, 2008 (Proceeding). On June 10, 2008, the Public Utility Commission (Commission) accepted the Proceeding for consideration and assigned the Proceeding to Administrative Law Judge Michael Grant.

Energy Trust of Oregon, Inc. (Energy Trust) strongly supports the Proceeding petitioners' request for expedited consideration. Energy Trust's purpose for filing a petition to intervene is to be able to describe the possible consequences on Energy Trust's renewable energy programs as a result of Commission rulings on issues raised by the Proceeding.

Sincerely,

A handwritten signature in black ink that reads "Debbie Menashe".

Debbie Goldberg Menashe
Senior Counsel

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DR 40

In the Matter of)	
)	PETITION TO INTERVENE
HONEYWELL INTERNATIONAL, INC.)	
and HONEYWELL GLOBAL FINANCE,)	
LLC,)	
)	
and)	
)	
PACIFICORP, dba PACIFIC POWER)	

Pursuant to ORS 756.525 and OAR 860-012-0001, Energy Trust of Oregon, Inc., (“Energy Trust”) hereby petitions the Public Utility Commission of Oregon (“Commission”) to intervene as a party in DR-40, the petition of the above-referenced parties to issue a declaratory ruling, on an expedited basis, regarding the implications of and statutory and regulatory application to certain third-party ownership models for renewable energy systems (the “Proceeding”).

1. Name and Address of Petitioner:

Energy Trust of Oregon, Inc.
851 SW Sixth Avenue, Suite 1200
Portland, Oregon 97204
Attention: Peter West, Director of Renewable Energy

2. Name and Address of Energy Trust Legal Counsel

John Volkman, General Counsel
Energy Trust, 851 SW Sixth Avenue, Suite 1200
Portland, Oregon 97204

Debbie Goldberg Menashe, Senior Counsel
Energy Trust
851 SW Sixth Avenue Suite 1200
Portland, Oregon 97204

3. Number of Members and Purposes of the Organization

Energy Trust is a not-for-profit corporation organized under Oregon law to change how Oregonians produce and use energy by investing in efficient

technologies and renewable resources that save dollars and protect the environment. Energy Trust is not organized with members.

4. Nature and Extent of Energy Trust's Interest in the Proceeding:

Energy Trust invests Oregon's public purpose funds in the above-market cost of renewable energy projects, including solar projects, by providing incentives towards such costs. The ruling in this Proceeding will have a significant and immediate impact on Energy Trust's renewable energy program and projects. In 2008, more than 80% of Energy Trust incentives reserved for commercial solar installations are for projects using third party ownership arrangements. Energy Trust has experience with, and an understanding of, the current Oregon market for renewable energy systems and the impact of the Commission rulings coming out of the Proceeding with respect to this market. Energy Trust is interested in obtaining expedited rulings on the issues identified by the Parties so that projects for which incentives have been reserved can continue towards completion in 2008 as planned.


5. Issues Energy Trust Intends to Raise at the Proceeding:

Energy Trust does not intend to raise issues beyond those raised by the parties to the Proceeding, but Energy Trust intends to provide information on the possible consequences on Energy Trust's renewable energy programs of as a result of Commission rulings on issues raised by the Proceeding.

THEREFORE, Energy Trust respectfully requests that the Public Utility Commission grant Energy Trust's Petition to Intervene in the declaratory ruling proceeding the Commission accepted for consideration on June 10, 2008.

DATED this 17th day of June, 2008

Respectfully submitted,
ENERGY TRUST OF OREGON, INC.

By: 
Debbie Goldberg Menashe
Senior Counsel
851 SW Sixth Avenue, Suite 1200
Portland, Oregon 97204
(503) 445-7608
Debbie@energytrust.org

CERTIFICATE OF SERVICE

I hereby certify that on the 17th of June 2008, I served the within Petition to Intervene in Declaratory Ruling Proceeding upon John W. Stephens, attorney for Honeywell International, inc. and Honeywell Global Finance, LLC, Michelle R. Mishoe, attorney for Pacificorp, dba Pacific Power, and Bill Nessly and Theodore Falk, attorneys for Oregon Department of Transportation, by then depositing in United States Post Office at Portland, Oregon, a full, true and correct copy therefore addressed to:

John W. Stephens
Esler Stephens & Buckley
888 SW Fifth Avenue, Suite 700
Portland, Oregon 97204-2021

and

Michelle R. Mishoe
Pacific Power & Light
825 NE Multnomah, Suite 1800
Portland, Oregon 97232

and

William F. Nessly Jr.
Theodore Falk
Senior Assistant Attorneys General
Oregon Department of Justice
General Counsel Division
1162 Court Street N.E.
Salem, Oregon 97301

and prepaying the postage thereon.



Debbie Goldberg Menashe
Senior Counsel
Attorney for Petitioner to Intervene
Energy Trust of Oregon