

Date: 20 June 2008

To: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, #215
Salem, Oregon 97308-2148
Puc.filingcenter@state.or.us

Subject: Petition to Intervene PUC Docket No: DR-40

Commissioners:

In the matter of Honeywell International, Inc. and Honeywell Global Finance LLC, and PacifiCorp(dba Pacific Power), assigned PUC Docket number DR-40, please find enclosed our original Petition to Intervene. Gerding Edlen Sustainable Solutions waives paper service in this matter.

We respectfully request intervener status because this inquiry has already significantly impacted work on some of our projects, and the outcome of the ruling has the potential to summarily terminate the third-party ownership segment of our business in the State of Oregon.

We appreciate your considerations in this matter.

Rhecca for Dennis Wilde

Dennis Wilde
Gerding Edlen Sustainable Solutions

Gerding Edlen

SUSTAINABLE SOLUTIONS

503.299.6000 t

503.299.6703 f

1120 NW COUCH ST. #600

PORTLAND, OR 97209



People. Planet. Profit.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. DR-40

In the Matter of) HONEYWELL INTERNATIONAL, ICN.,) and HONEYWELL GLOBAL FIANANCE,) LLC,) and) PACIFICORP, dba PACIFIC POWER))	PETITION TO INTERVENE
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NAME OF PETITIONER:	Gerding Edlen Energy Company, dba Gerding Edlen Sustainable Solutions
ADDRESS:	1120 NW Couch Street, Suite 600, Portland, Oregon 97209
PHONE NUMBER:	503-299-6000
FAX NUMBER:	503-299-6703
E-MAIL ADDRESS:	dennis.wilde@gerdingedlen.com

NAME OF COUNSEL FOR PETITIONER:	None for this petition
COUNSEL'S ADDRESS:	
COUNSEL'S PHONE NUMBER:	
COUNSEL'S FAX NUMBER:	
COUNSEL'S E-MAIL ADDRESS:	

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:
Gerding Edlen Sustainable Solutions (www.gerdingedlen.com) is an Oregon domestic business corporation with 5 principals and less than ten employees.
Gerding Edlen Sustainable Solutions develops distributed infrastructure system including commercial-scale solar electric power projects in the US.

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

Gerding Edlen Sustainable Solutions is a vertically intergrated service organization involved in all stages of photovoltaic (PV) project lifecycle including marketing, sales, finance, design, engineering, installation, ongoing maintenance, upgrades and eventual disposition.

Gerding Edlen Sustainable Solutions has spent substantial funds and personnel over the past two years establishing a business operation in renewable energy as a subsidiary of our real estate development company. This includes both directly sold and third party financed small and medium scale PV systems in both PGE and Pacific Power territory including a 100 kWp DC system for Oregon State University, a 80 kWp DC system for Southern Oregon University/Roseburg Community College, a 100 kWp DC system for Portland State University and others.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

Gerding Edlen Sustainable Solutions has devoted substantial portion of its business model, finances and personnel resources to developing third-party owned commercial scale PV systems in the State of Oregon, in part based on the State's Net Metering Law (ORS 757.300) and the Oregon PUC's net metering rules (OAR 860.039). If the PUC makes a ruling in favor of Pacific Power that either (i) developers of third-party owned PV systems must be Electricity Service Suppliers, or (ii) third-party owned PV systems are not eligible for net metering, our company will be forced to summarily close down this portion of our business in Oregon.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

In the last seven years Gerding Edlen has installed several building integrated PV systems on residential and commercial high rise buildings in Oregon. Our parent company is headquartered in Portland, Oregon and is a nationally recognized leader in the development of environmentally responsible real estate development. Our move into distributed infrastructure, including solar PV installations is in direct response to the need we see to create a built environment that is aligned with the resource capacity and natural systems of the planet.

Gerding Edlen Sustainable Solutions has a detailed working knowledge of the structure and intricacy of third-party financed commercial-scale solar electric projects.

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 860-012-0001.

Dennis J. Wilde, Pres. 
Petitioner or Petitioner's Representative

June 22, 2008
Date