



**To:** Filing Center  
Public Utility Commission of Oregon  
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**Subject:** Petition to Intervene  
PUC Docket No: DR-40

**Date:** 23 June 2008

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 Environment Oregon's original Petition to Intervene. Environment Oregon waives paper service in this matter.

We respectfully request intervener status because of the potential for this inquiry to seriously damage the ability of consumers, including nonprofit organizations, to acquire and use solar energy systems.

A handwritten signature in black ink, appearing to read "Jeremiah Baumann". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeremiah Baumann  
Environment Oregon

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**Docket No. DR-40**

**In the matter of  
HONEYWELL )  
INTERNATIONAL, INC., )  
and HONEYWELL )  
GLOBAL FINANCE, LLC, )  
and PACIFICORP, dba )  
PACIFIC POWER )  
)**

**PETITION TO INTERVENE**

**Name of Petitioner:** Environment Oregon  
**Address:** 1536 SE 11<sup>th</sup> Ave., Portland, Oregon 97214  
**Phone Number:** 503-231-1986 x 310  
**Fax Number:** 503-231-4007  
**Email address:** jeremiah@EnvironmentOregon.org

**Name of Counsel for this petitioner:** None for this petition to intervene

**If the petitioner is an organization, the number of members and the purposes of the organization:**

Environment Oregon is a membership-based environmental advocacy organization with 22,000 members statewide. The organization’s purposes include advocating on a broad range of environmental issues. One priority area is conserving energy, transitioning to renewable sources of energy, and reducing global warming pollution; as part of this priority, the organization strongly supports increasing the use of solar energy in Oregon.

**Nature and extent of the petitioner’s interest in the proceeding:**

As stated above, one priority area of interest is in conserving energy, transitioning to renewable sources of energy, and reducing global warming pollution; as part of this priority, the organization strongly supports increasing the use of solar energy in Oregon. To pursue this goal, the organization believes strongly in making solar energy affordable to more Oregonians and Oregon organizations, including nonprofit organizations and government institutions. In addition, the organization has many members either interested in or actively acquiring solar photovoltaic energy systems for their homes, businesses, or organizations.

**The issues the petitioner intends to raise at the proceeding:**

Broad access to solar energy systems is in the interest of sustainable energy policy and global warming pollution reduction. Environment Oregon intends to raise issues regarding the importance of third-party financing models and net metering to making solar energy systems affordable and accessible, particularly for consumers or organizations for whom up-front costs are a barrier to using solar power. Environment Oregon also intends to respond directly to legal concerns about third-party financing and net metering.

**Any special knowledge or expertise of the petitioner that would assist the commission in resolving the issues in the proceeding:**

Environment Oregon has expertise in energy and global warming policy. Environment Oregon has worked recently on net metering and third-party financing policies both in rules and legislation, and is part of a network of similar state-based organizations around the country that also maintain a federal policy, so the organization also has expertise in other states' and jurisdictions policies in this area. As an environmental program that was formerly part of the Oregon State Public Interest Research Group (OSPIRG), the organization was involved in SB 1149, legislation relevant to legal definitions cited in the filings that initiated the current docket.

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 I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001.

\_\_\_\_\_/s/--JDB\_\_\_\_\_  
Jeremiah Baumann, Environment Oregon

\_\_\_\_23 June 2008\_\_\_\_\_  
Date

Petitioner or Petitioner's Representative