

Keyes & Fox, LLP

Distributed Generation Law

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June 23, 2008

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

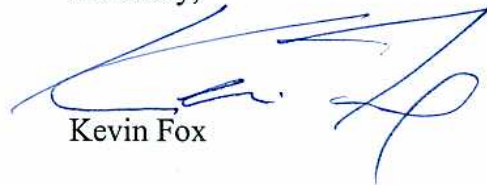
**Re: DR 40 – In the Matter of HONEYWELL INTERNATIONAL, INC.,
HONEYWELL GLOBAL FINANCE, LLC and PACIFICORP, dba PACIFIC
POWER Application for Declaratory Ruling.**

Attention Filing Center:

Enclosed for filing in the above-captioned docket are an original and one copy of the Petition to Intervene of the Interstate Renewable Energy Council and Waiver of Paper Service.

Thank you for your assistance.

Sincerely,



Kevin Fox

Enclosures

Cc: Service List-DR 40

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DR 40

In the Matter of)	
)	
HONEYWELL INTERNATIONAL, INC.,)	
HONEYWELL GLOBAL FINANCE, LLC)	PETITION TO INTERVENE OF
)	THE INTERSTATE RENEWABLE
and)	ENERGY COUNCIL
)	
PACIFICORP, dba PACIFIC POWER)	
)	
Application for Declaratory Ruling.)	

Pursuant to OAR § 860-012-0001, the Interstate Renewable Energy Council (IREC) respectfully petitions the Oregon Public Utility Commission (OPUC) to intervene in the above-referenced proceeding.

In support of this Petition, IREC represents as follows:

a). IREC's Name and Address:

Interstate Renewable Energy Council
P.O. Box 1156
Latham, NY 12110-1156

b). Name and Address of IREC's Legal Counsel:

IREC will be represented in this proceeding by Kevin Fox with the law firm of Keyes & Fox, LLP. All documents relating to this proceeding should be served on Mr. Fox at the following address:

Kevin T. Fox
Keyes & Fox, LLP
5727 Keith Avenue
Oakland, CA 94618
Phone: (510) 381-3052
Email: kfox@keyesandfox.com

c). Information about IREC:

For over two decades, IREC has worked as a non-profit organization to move renewable energy resources into the marketplace. IREC provides a national forum in which public and private agencies involved with renewable energy may gather, disseminate and exchange information, and engage in cooperative efforts to accelerate sustainable utilization of renewable

energy sources and technologies in and through government activities. IREC emphasizes education and outreach, stakeholder coordination, technical assistance, workforce development, the adoption and implementation of uniform guidelines and standards, and consumer protection.

d). IREC's Interest in this Proceeding:

With funding from the U.S. Department of Energy, IREC's mission includes assisting state utility regulatory commissions in identifying "best practices" in the areas of net metering and interconnection of renewable resources. IREC desires intervenor status in this proceeding so it may share the benefit of the considerable experience it has gained in working with states to develop net metering rules including the application of those rules to businesses engaged in sales of solar generation to solar energy services agreements.

e). Issues IREC Intends to Raise:

IREC intends to submit comments in response to the questions posed by Chief Administrative Law Judge Michael Grant in his Memorandum issued June 20, 2008 in this proceeding. IREC's participation will not unreasonably broaden the issues, burden the record, or delay the proceeding.

f) IREC's Special Knowledge and Expertise:

IREC has entered appearances or submitted comments in net metering proceedings before utility regulatory commissions in numerous states, including Alaska, Arizona, Florida, Illinois, Kentucky, Nevada, North Carolina, Texas and Virginia.

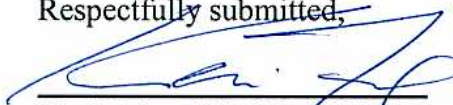
g) Waiver of Paper Service:

Pursuant to OAR § 860-013-0070(4), IREC hereby waives paper service of documents in this proceeding.

For the reasons stated herein, IREC respectfully requests that it be allowed to intervene in this matter.

Dated this 23rd day of June, 2008.

Respectfully submitted,



Kevin Fox, OSB No. 05255

Attorney for the Interstate Renewable Energy Council

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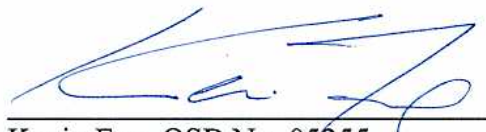
CERTIFICATE OF SERVICE

I certify that on the 23rd day of June, 2008, I served the foregoing Petition to Intervene of the Interstate Renewable Energy Council upon the persons named on the attached service list by electronic mail and/or by mailing a full, true and correct copy thereof with first class postage prepaid.

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DATED: June 23, 2008.



Kevin Fox, OSB No. 05255
Attorney for the Interstate Renewable Energy Council