

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. 07-002 as modified by 07-047

In the Matter of Omissions from PGE  
IRP Add Risk to Ratepayers and to  
Attainment of Oregon Greenhouse Gas  
Reduction Goals

PETITION TO INTERVENE

Edward Averill petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Edward Averill  
Company: Not Applicable  
Street Address: 8815 SW Oxbow Ter  
City, State, Zip: Beaverton, OR 97008  
Email Address: eda@acm.org  
Telephone: 503-807-2460

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Tracy Farwell  
Company: Not Applicable  
Street Address: 3627 SE 77<sup>th</sup> Ave  
City, State, Zip: Portland, OR, 97206  
Email Address: farwellt@msn.com  
Telephone: 503-477-8811

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

3

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

I am questioning the conclusions made from the IRP study.

My interest is to see that PGE does not make an investment that will be counter to State of Oregon climate goals and objectives.

My further interest is that the investment will not be subject to becoming stranded assets within the normal lifetime of the project, which could happen either because of internalized externalities, or from competition

5. The issues the Petitioner intends to raise at the proceeding are:

The guidance of Guidelines Adopted under Order # 07-002 as modified by 07-047 require analysis of risks of external costs becoming internalized during the project.

We know that major changes are coming to climate rules that will affect the requirements. We know that there is new scientific evidence of a need for such changes in the rules. We have followed the recent investigations into the use of Natural Gas and its collateral release of Fugitive Methane, and conclude that it is a parallel damage to importing electricity from plants fueled by coal. The similar inclusions of the upstream leakage are equally justified.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Engineering education and analysis experience applied to climate and energy research.

7. 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 860-001-0300.

Edward Averill  
Petitioner or Petitioner's Representative

1/24/2017  
Date Signed