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May 28, 2019

Oregon Public Utility Commission
Attn: PUC Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088

PUC.FilingCenter@state.or.us

Re: LC 73 – Portland General Electric 2019 IRP
National Grid's Petition to Intervene

Enclosed for filing in the above-referenced docket, please find the Petition to Intervene of National Grid USA.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Tom Marshall

Tom Marshall
TROUTMAN SANDERS LLP

Attorney for National Grid USA

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2019 Integrated Resource Plan.

NATIONAL GRID'S PETITION TO
INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), National Grid USA (“National Grid”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7). In support of this Petition, National Grid represents:

1. The contact information (name, address, e-mail address) for National Grid is:

National Grid USA
Attn: Nathan Sandvig
205 SE Spokane Street, Suite 300
Portland, OR 97202
Nathan.Sandvig@nationalgrid.com

2. The names and addresses of the persons to be included on the official service list in this docket are:

Nathan Sandvig
Director, Business Development
National Grid USA
205 SE Spokane Street, Suite 300
Portland, OR 97202
Phone: (503) 602-0998
Nathan.Sandvig@nationalgrid.com

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3. National Grid is a subsidiary of National Grid plc. National Grid plc has utility operations in both the United Kingdom and the United States. National Grid is actively engaged in the development and operation of bulk transmission and bulk storage assets to enable the transition of the United States' electric system to a low-carbon grid.

4. As a company, National Grid is technology agnostic, and is considering various energy storage opportunities throughout the western United States, including within the state of Oregon and in the service territory of Portland General Electric. Among other technologies, National Grid is interested in pumped storage hydroelectric projects and the ability of these projects to support other renewable energy technologies as an integration tool at the necessary scale to stabilize the variable output from renewable energy resources. Additionally, National Grid has an interest in resource planning and ensuring that Portland General Electric's integrated resource planning process appropriately analyzes and considers opportunities for investment in generation, transmission, and energy storage.

5. National Grid intends to participate as a party in this proceeding to raise any pertinent issues.

6. National Grid has special knowledge and expertise that would assist the Commission in resolving the issues in this proceeding. National Grid has vast experience and expertise in


balancing the electricity system and ensuring electric markets run efficiently, and this experience and expertise would provide a unique and important voice to this discussion.

7. Based on the information provided above, and in accordance with the Commission's rules of procedure, National Grid hereby requests to participate in this proceeding as an intervenor. National Grid will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See* OAR 860-001-0300.

8. National Grid therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 28th day of May, 2019

Respectfully submitted

By: 
Nathan Sandvig
Director, Business Development
National Grid USA