

27 November 2009

Filing Center  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97308-2148

RE: PUC Docket No. UM 1452  
Petition to Intervene of Raymond P Neff

Attention Filing Center:

Please find enclosed an original and one copy of Petition to Intervene of Raymond P Neff. I waive paper service of documents.

This document is also being sent electronically to [PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us).

Thanks in advance,

*/s/ Raymond P Neff* \_\_\_\_\_

Raymond P Neff  
465 ½ River Rd.  
Eugene, OR 97404  
[rpneff@efn.org](mailto:rpneff@efn.org)

CC: Service List  
Enclosures

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing Petition to Intervene of Raymond P Neff PUC Docket No. UM 1452 by electronic mail and US mail to those parties who have not waived paper service on the attached service list.

Dated this 27th day of November 2009.

/s/ *Raymond P Neff*

Raymond P Neff

**TEDDY KEIZER (W)**

1615 SE 30TH AVE  
PORTLAND OR 97214

**CABLE HUSTON BENEDICT  
HAAGENSEN & LLOYD, LLP (W)**

RAYMOND S KINDLEY  
1001 SW FIFTH AVENUE, SUITE 2000  
PORTLAND OR 97204-1136

**CITIZENS' UTILITY BOARD OF  
OREGON (W)**

GORDON FEIGNER  
ENERGY ANALYST  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205

ROBERT JENKS  
610 SW BROADWAY STE 308  
PORTLAND OR 97205

G. CATRIONA MCCracken  
LEGAL COUNSEL/STAFF ATTY  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205

**DAVISON VAN CLEVE**

IRION A SANGER  
ASSOCIATE ATTORNEY  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204

**DAVISON VAN CLEVE PC**

MELINDA J DAVISON  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204

**DEPARTMENT OF JUSTICE**

STEPHANIE S ANDRUS  
ASSISTANT ATTORNEY GENERAL  
REGULATED UTILITY & BUSINESS  
SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096

**ECUMENICAL MINISTRIES OF OREGON  
(W)**

JENNY HOLMES  
ENVIRONMENTAL MINISTRIES  
DIRECTOR  
0245 SW BANCROFT, SUITE B  
PORTLAND OR 97239

**ECUMENICAL MINISTRIES OF OREGON  
(W)**

KATHLEEN NEWMAN  
OREGON INTERFAITH POWER &  
LIGHT  
1553 NE GREENSWORD DR  
HILLSBORO OR 97214

**ENERGY TRUST OF OREGON (W)**

KACIA BROCKMAN  
851 SW SIXTH AVE - STE 1200  
PORTLAND OR 97204

JOHN M VOLKMAN  
GENERAL COUNSEL  
851 SW 6TH AVE SUITE 1200  
PORTLAND OR 97204

**ENVIRONMENTAL LAW ALLIANCE  
WORLDWIDE (W)**

JENNIFER GLEASON  
1877 GARDEN AVE  
EUGENE OR 97403

**ESLER STEPHENS & BUCKLEY (W)**

JOHN W STEPHENS  
888 SW FIFTH AVE STE 700  
PORTLAND OR 97204-2021

**IDAHO POWER COMPANY (W)**

RANDY ALLPHIN  
  
CHRISTA BEARRY  
PO BOX 70  
BOISE ID 83707-0070

KARL BOKENKAMP  
GENERAL MANAGER-POWER  
SUPPLY PLANNING

PO BOX 70  
BOISE ID 83707-0070

RICK GALE

BARTON L KLINE  
SENIOR ATTORNEY  
PO BOX 70  
BOISE ID 83707-0070

JEFF MALMEN  
PO BOX 70  
BOISE ID 83707-0070

LISA D NORDSTROM  
ATTORNEY  
PO BOX 70  
BOISE ID 83707-0070

GREGORY W SAID  
DIRECTOR - REVENUE  
REQUIREMENT  
PO BOX 70  
BOISE ID 83707

MARK STOKES  
MANAGER, POWER SUPPLY &  
PLANNING  
PO BOX 70  
BOISE ID 83707

MICHAEL YOUNGBLOOD  
SENIOR PRICING ANALYST  
PO BOX 70  
BOISE ID 83707

**MCDOWELL & RACKNER PC (W)**

WENDY MCINDOO  
OFFICE MANAGER  
520 SW 6TH AVE STE 830  
PORTLAND OR 97204

LISA F RACKNER  
ATTORNEY  
520 SW SIXTH AVENUE STE 830  
PORTLAND OR 97204

**MULTNOMAH COUNTY W)**

WARREN FISH  
501 SE HAWTHORNE, STE 600  
PORTLAND OR 97214

**MULTNOMAH COUNTY  
COMMISSIONER (W)**

COMMISSIONER JEFF COGEN  
501 SE HAWTHORNE, STE 600  
PORTLAND OR 97214

**OREGON AFL-CIO**

2110 STATE ST  
SALEM OR 97301

JOHN BISHOP  
1635 NW JOHNSON ST  
PORTLAND OR 97209

**OREGON DISTRICT COUNCIL OF  
LABOERS (W)**

BEN NELSON  
10245 SE HOLGATE BLVD  
PORTLAND OR 97266

**OREGON DISTRICT COUNCIL OF  
LABORERS' (W)**

MELODY GUY

**OREGONIANS FOR RENEWABLE  
ENERGY PAYMENTS (W)**

JUDY BARNES  
1425 SE 37TH  
PORTLAND OR 97214

MARK PETE PENGILLY  
PO BOX 10221  
PORTLAND OR 97296

**PACIFICORP (W)**

RYAN FLYNN  
825 NE MULTNOMAH, SUITE 1800  
PORTLAND OR 97232

**PACIFICORP, DBA PACIFIC POWER  
(W)**

PACIFIC POWER OREGON DOCKETS  
825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232

**PGE RATES & REGULATORY AFFAIRS**

DOUG KUNS  
PORTLAND GENERAL ELECTRIC  
COMPANY  
121 SW SALMON STREET, 1WTC0702  
PORTLAND OR 97204

**PORTLAND GENERAL ELECTRIC  
COMPANY**

J RICHARD GEORGE  
121 SW SALMON ST 1WTC1301  
PORTLAND OR 97204

**PUBLIC UTILITY COMMISSION OF  
OREGON**

THERESA GIBNEY  
PO BOX 2148  
SALEM OR 97308

**RENEWABLE NORTHWEST PROJECT  
(W)**

ANN ENGLISH GRAVATT  
917 SW OAK - STE 303  
PORTLAND OR 97205

SUZANNE LETA LIOU  
917 SW OAK STE 303  
PORTLAND OR 97205

**SOLAR ENERGY SOLUTIONS, INC. (W)**

ANDREW KOYAANISQATSI  
3730 SE LAFAYETTE CT  
PORTLAND OR 97202

**SOUTHEAST UPLIFT  
NEIGHBORHOOD COALITION (W)**

TIM O'NEIL  
3534 SE MAIN ST  
PORTLAND OR 97212

**SUNEDISON (W)**

JOE HENRI  
12500 BALTIMORE AVE  
BELTSVILLE MD 20705

**SUSTAINABLE SOLUTIONS  
UNLIMITED LLC (W)**

STEVEN MCGRATH  
1339 SE 8TH AVE # B  
PORTLAND OR 97214

**UMPQUA BANK (W)**

DANIEL WELDON  
19790 SOUTH FERGUSON TERRACE  
OREGON CITY OR 97045

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. UM 1452

In the Matter of <div style="border: 1px solid black; padding: 5px;">PUBLIC UTILITY COMMISSION OF OREGON Investigation into Pilot Programs to demonstrate the use and effectiveness of Volumetric Incentive Rates for Solar Photovoltaic Energy Systems</div>	) ) ) ) ) )	PETITION TO INTERVENE
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NAME OF PETITIONER:	Raymond P Neff
ADDRESS:	465 1/2 River Rd, Eugene, OR, 97404
PHONE NUMBER:	541-688-8402
FAX NUMBER:	
E-MAIL ADDRESS:	rpneff@efn.org

NAME OF COUNSEL FOR PETITIONER:	
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:

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

As a resident of the state outside of an investor-owned utility service district, I have an interest in seeing this policy implemented successfully for the benefit of the state's solar industry, participating customer-generators, and with the long-range goal that it will then be expanded to include non IOU-customers in the state.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:**

I'll monitor the proceedings and where appropriate will offer suggestions for how to successfully implement FIT policy based on my recent research as a graduate student. Particularly, I'll be paying attention to how the incentive rate is set.

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

In 2006 I conducted research to estimate the amount of electricity that could be generated using solar PV on large commercial and public buildings in Eugene, Oregon for my BS at the University of Oregon.

I was first exposed to feed-in tariff policy while conducting research on renewable energy during a study abroad program in Kefalonia, Greece in 2007 as part of my graduate studies at the UO.

I completed my Masters degree in Community & Regional Planning at the UO in September 2009. My graduate research examined best practices in feed-in tariff policy design, and specifically how it could be implemented in Oregon. Using Eugene as a case study, this research estimated the impact of FIT policy (HB 3039 and an alternative proposal) on electricity ratepayers in Eugene and across Oregon, and the potential job creation and greenhouse gas emission reduction benefits that could result.

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.

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Petitioner or Petitioner's Representative

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Date