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December 31, 2012

Public Utilities Commission of Oregon  
Filing Center  
POB 2148  
Salem, OR 97308

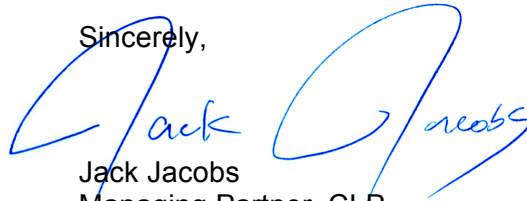
**RE: UM 1610**

Dear Public Utilities Commission,

Enclosed please find for filing a Petition of Small Business Advocates to Intervene in UM 1610 and a Waiver of Paper Service.

If you have any questions, or require any additional information, please feel free to contact me, or Diane Henkels at (541) 270-6001. Thank you in advance for your assistance.

Sincerely,



Jack Jacobs  
Managing Partner, CLP

cc: James Birkelund, SBUA  
Diane Henkels, CLP



3. Issues SBUA intends to raise generally pertain to maintaining a rate pricing that is reasonable for smaller businesses including, among others, those in the energy sector, and expression of pricing that is reasonably understandable to community-based renewable energy project decision-makers.

4. Special knowledge or expertise SBUA contributes to the docket includes experience representing clients in energy and business related matters, Oregon-based legal counsel who has previously intervened in related docket UM 1396, has worked with PURPA projects previously, and serves as legal counsel to entities in the energy and related sectors. Counsel representing SBUA has extensive experience with small business entities, and is familiar with related renewable energy generation issues throughout the Pacific Northwest.

5. SBUA's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding, and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. SBUA will be represented in this matter by the following:

Diane Henkels  
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7. SBUA hereby requests to be added to the service list in this docket at the address set forth above.

8. SBUA hereby waives paper service in this docket.

RESPECTFULLY SUBMITTED December 31, 2012.



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Diane Henkels  
Of Counsel , Cleantech Law Partners PC  
Counsel for Small Business Utility Advocates

CERTIFICATE OF FILING SERVICE

I hereby certify that on December 31, 2012, I filed the original and one copy of PETITION TO INTERVENE in UM 1610 Staff Investigation Into Qualifying Facility Contracting and Pricing, and NOTICE OF WAIVER OF PAPER SERVICE upon the persons named in the Service list by electronic mail only as all parties have waived service.

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