



**Cleantech Law Partners, PC**  
548 Market Street, Suite 59966  
San Francisco, CA 94104  
[www.cleantechlawpartners.com](http://www.cleantechlawpartners.com)  
866.233.8064

April 13, 2016

***Via Electronic Filing***

Public Utilities Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97308  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON  
Implementing an Energy Storage Program Guidelines  
pursuant to House Bill 2193  
Docket No. UM 1751

Dear Filing Center:

Enclosed for filing in the above-referenced docket is the Petition to Intervene on behalf of Small Business Utility Advocates (“SBUA”).

Please contact me at [dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com) or 541-270-6001 if you have any questions. Thank you for your assistance in this matter.

Sincerely,

/s/ Diane Henkels

Diane Henkels  
Cleantech Law Partners PC  
Counsel for SBUA  
420 SW Washington St. Ste 400  
t: 541-270-6001  
e: [dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com)

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1751**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	
OREGON	)	PETITION TO INTERVENE OF SMALL
	)	BUSINESS UTILITY ADVOCATES
Implementing Energy Storage Program	)	
Guidelines pursuant to House Bill 2193	)	

---

Pursuant to ORS 756.525 and OAR 860-001-0300, Small Business Utility Advocates, (“SBUA”) petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, SBUA represents as follows:

- 1. The contact information for SBUA to be included on the service list is:

James Birkelund  
SBUA  
548 Market Street, Ste 11200  
San Francisco, CA 94104  
[james@utilityadvocates.org](mailto:james@utilityadvocates.org)

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

Diane Henkels  
Of Counsel  
Cleantech Law Partners, PC  
420 SW Washington St. Ste 400  
Portland, OR 97204  
Tel: 541-270-6001  
[dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com)

Lolly Anderson  
Of Counsel  
Cleantech Law Partners, PC  
1724 SE Taylor St.  
Portland, OR 97214  
Tel: 619-995-1057  
[landerson@cleantechlaw.com](mailto:landerson@cleantechlaw.com)

- 3. SBUA is a nonprofit 501(c)(3) organization that represents, protects, and promotes the interests of small business utility customers. SBUA has approximately 200 members, of which many are Oregon-based entities, and including at least two member organizations with several members which have done business in Oregon. Members in

Oregon are customers of PacifiCorp, Portland General Electric (“PGE”), and some consumer owned utilities. SBUA provides information and assistance with regard to utility proceedings before utility commissions, appropriate federal regulatory agencies, the courts, and other public bodies, and provides advice to small businesses with respect to utility service. The nature and extent of SBUA’s interest in this docket includes representation and advocacy for small nonresidential customer interests in relation to implementation of the energy storage legislation HB 2193 (2015) and production of the Commission’s Report by September 15, 2016.

4. SBUA intends to raise issues pertaining to proposed prudently incurred costs in the utility proposals as they are pertinent to small nonresidential customers how the utility proposals and development of the Energy Storage Guidelines to be adopted by the Public Utility Commission by January 1, 2017, focusing on the impact on small business.

5. SBUA has special knowledge or expertise to contribute to this docket from previous experience testifying before and participating in matters before the Commission and the Oregon Legislature regarding the relation of small businesses, even those not directly in renewable energy, to Oregon’s clean energy economy, and also with regard to electricity dockets and energy storage provisions, including recent legislation pertaining in part to the same. Additionally, SBUA’s legal counsel has significant experience in utility regulatory matters, including advising residential and small business clients in rate-making in electricity and water-related matters.

6. SBUA has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow SBUA to intervene in this proceeding. 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.

7. SBUA requests the addresses above be added to service list.

RESPECTFULLY SUBMITTED April 13, 2016.

/s/ Diane Henkels

---

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