

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Implementing Energy Storage Program
Guidelines Pursuant to House Bill 2193.

PETITION TO INTERVENE OF THE
ENERGY FREEDOM COALITION OF
AMERICA

The Energy Freedom Coalition of America (EFCA) 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:

Company: The Energy Freedom Coalition of America
Street Address: 601 13th Street, NW, Suite 900 North
City, State, Zip: Washington, DC 20005
E-mail: jjazynka@energyfreedomcoalition.com
Phone: (202) 600-0195

Please include this contact on the service list.

2a. The Petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Kevin T. Fox (Oregon Bar # 052551)
Company: Keyes, Fox & Wiedman LLP
Street Address: 1580 Lincoln St., Suite 880
City, State, Zip: Denver, CO 80203
E-mail Address: kfox@kfwlaw.com
Phone: (510) 314-8201

Petitioner's counsel waives paper service.

2b. Additional contacts to be included on the service list:

Electronic service only
Name: Meredith A. Roberts
Company: SolarCity

E-mail address: mroberts2@solarcity.com

3. If the Petitioner is an organization, the number of members in and the purpose of the organization: EFCA is a national advocacy group that promotes the use of Distributed Energy Resources (DERs). EFCA members provide DERs such as distributed generation, battery energy storage and micro grid products. EFCA's current members include NRG Energy, Inc., Silevo, LLC, SolarCity Corporation, ZEP Solar, LLC, Go Solar, LLC, 1 Sun Solar Electric, LLC, and Ecological Energy Systems. Members also provide solar generation, including products for residential, commercial, government, community solar, and utility-scale applications. EFCA member companies serve thousands of customers in Oregon with on-site solar electricity.

4. The nature and extent of the Petitioner's interest in the proceeding is: EFCA's members play an active role in the growth of DERs in Oregon. As a result, EFCA has a strong interest in promoting policies that encourage solar energy development as well as distributed storage and other energy management technologies in the state. EFCA's members' business operations include planning, developing, installing, selling or leasing, monitoring and maintaining solar and storage energy systems located on customers' property and interconnected to utility distribution systems. This proceeding will examine the potential value of applying energy storage system technology in Oregon. As such, the Commission's findings and determinations regarding the value of storage systems will have a substantial impact on EFCA's members' core business models and product offerings in Oregon. As a result, EFCA's members have a direct and substantial interest in this proceeding. Only through direct participation in this proceeding can EFCA protect its members' interests.

5. The issues the Petitioner intends to raise at the proceeding are: EFCA intends to comment on the methodology and inputs for determining the value of storage and the means for encouraging investment in different types of storage systems. EFCA also intends to comment on the value of non-utility ownership of storage systems as well as the increased benefits that aggregations of DER technologies can provide. These issues are well within the scope of this proceeding. Therefore, EFCA's participation will not unreasonably broaden the issues.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is: EFCA's members have substantial knowledge of the economic, technical and policy issues concerning the development, interconnection and operation of storage systems. As a result, EFCA is particularly well suited to assist the Commission in resolving the issues in this proceeding. EFCA has participated, and is currently active, in regulatory proceedings in over 12 states, many of which are addressing issues similar to those raised by this proceeding. EFCA requests intervenor status to assist the Commission in resolving the issues in this proceeding.

7. Based on the information provided above in accordance with the Commission's rules of procedure, EFCA requests to participate in this proceeding as an intervenor. EFCA will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

DATED this 29th day of March, 2016

Respectfully Submitted,

KEYES, FOX & WIEDMAN, LLP

/s/ Kevin T. Fox

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*Counsel to the Energy Freedom
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