

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1751

In the Matter of Implementing Energy
Storage Program Guidelines pursuant to
House Bill 2193.

PETITION TO INTERVENE

Alevo Analytics 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:

Name: Dr. Randell Johnson, P.E.
Company: Alevo Analytics, Alevo USA Inc.
Street Address: 2321 Concord Parkway S.
City, State, Zip: Concord, NC 28027
Email Address: RJ@alevo.com
Telephone: (203) 982-8263

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Charlotte Brown
Company: Alevo Analytics, Alevo USA Inc.
Street Address: 2321 Concord Parkway S.
City, State, Zip: Concord, NC 28027
Email Address: charlotte.brown@alevo.com
Telephone: (910) 200-8409

Name: Christina Unneberg
Company: Alevo Analytics, Alevo USA Inc.
Street Address: 2321 Concord Parkway S.
City, State, Zip: Concord, NC 28027
Email Address: christina.unneberg@alevo.com
Telephone: (704) 516-6756

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

The nature of Alevo Analytics's interest in this proceeding is to provide responses to Docket UM 1751 - Implementing Energy Storage Program Guidelines pursuant to House Bill 2193. Alevo USA Inc. is a manufacturer of energy storage systems.

5. The issues the Petitioner intends to raise at the proceeding are:

Alevo Analytics provides a response for the need for utilities to complete storage potential evaluations and file them with the Commission before the storage projects are submitted.

Alevo Analytics proposes that the Commission, with possible public input, draft a plan for storage evaluation metrics that the utilities can use in the evaluation of storage potential.

Alevo Analytics provides a response requesting that the Commission consider requiring utilities to test storage projects that provide two or more simultaneously stacked services of frequency response, transient response, peak shaving, solar firming, distribution deferral, transmission deferral, generation peaking plant deferral, and reduced operational costs.

Alevo Analytics proposes that the utilities should include the rules and the assumptions for dispatching the energy storage for multiple services and clarify whether or not the sub-hourly dispatch of energy storage will be possible in addition to day-ahead scheduling of storage services.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Dr. Randell Johnson, P.E. has a background in strategy, regulatory finance, economic optimizations, quantitative finance, electricity and energy markets,

public policy, technical grid design, real-time optimizations, and high-performance computing. Dr. Johnson has advised globally on the integration of energy storage with utility systems and leads Alevo Analytics' business for energy storage valuation and applications.

His qualifications are in Quantitative Finance (MSc) (Cass Business School), Gas and Electric Utility Corporate Finance (UConn School of Business), and Electric Power Engineering (Ph.D., MEng) (Rensselaer Polytechnic Institute).

7. 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 860-001-0300.

Dr. Randell Johnson
Petitioner or Petitioner's Representative

6/23/2016
Date Signed