



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
503-464-7181 • Facsimile 503-464-2200

V. Denise Saunders
Associate General Counsel

December 21, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, OR 97308-1088

Re: UM 1751 Implementing an Energy Storage Program

Attention Filing Center:

Enclosed for filing in the above-referenced docket is Portland General Electric Company's ("PGE") Petition to Intervene to be electronically filed on December 21, 2015 with the Oregon Public Utility Commission.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive, flowing style.

V. Denise Saunders
Associate General Counsel

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION
OF OREGON,

Implementing an Energy Storage Program.

**PORTLAND GENERAL ELECTRIC
COMPANY's**

PETITION TO INTERVENE

Portland General Electric Company (“PGE” or the “Company”) petitions to intervene in this proceeding pursuant to ORS 756.525 and OAR 860-001-0300. In support of this petition, PGE provides the following.

- a) The name and address of the Company is:

Portland General Electric Company
121 SW Salmon Street
Portland, Oregon 97204

- b) The name and address of the person to be included on the official service list in

this proceeding is:

V. Denise Saunders
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Joseph Ross
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(503) 464-8966
Joseph.Ross@pgn.com

c) PGE is a public utility subject to the jurisdiction of the Commission. Decisions made and precedent established in this proceeding may directly affect PGE.

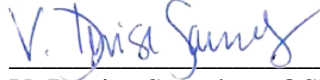
d) PGE intends to monitor the proceeding and, if necessary, raise issues that are appropriate to the proceeding. No other party could adequately represent the interests of PGE.

e) PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Accordingly, PGE's petition to intervene should be granted.

DATED this 21st day of December, 2015.

Respectfully submitted,



V. Denise Saunders, OSB 903769
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