



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

December 22, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

RE: UM 1751—PacifiCorp's Petition to Intervene

PacifiCorp d/b/a Pacific Power encloses for filing its Petition to Intervene in the above-referenced docket.

If you have questions about this filing, please contact Erin Apperson, Manager Regulatory Affairs, at (503) 813-6642.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

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

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON,
Implementing an Energy Storage Program.

PacifiCorp's Petition to Intervene

1 PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully petitions to
2 intervene in these proceedings under ORS 756.525 and OAR 860-001-0300. In support of
3 this petition, the Company states:

4 1. The contact information for the Company is:

5 PacifiCorp d/b/a Pacific Power
6 825 NE Multnomah Street, Suite 2000
7 Portland, OR 97232

8 2. The names and addresses of the persons to be included on the official service list
9 in this docket are:

Etta Lockey
Senior Counsel
Pacific Power
825 NE Multnomah Street, Suite 1800
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10 3. The Company is an electric public utility in the state of Oregon and is subject to
11 the jurisdiction of the Public Utility Commission of Oregon (Commission).

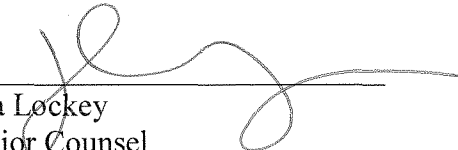
12 4. The Company intends to monitor this proceeding and, if necessary, raise issues
13 that are appropriate to the proceeding. No other party can adequately represent the interests
14 of the Company in this proceeding.

1 5. The Company has special knowledge or expertise that may assist the Commission
2 in resolving the issues in the proceeding.

3 6. Based on the information provided above in compliance with the Commission's
4 rules of procedure, the Company requests to participate in these proceedings as an intervenor.
5 The Company's participation in this docket will not unreasonably broaden the issues, burden
6 the record, or delay the proceeding.

7 The Company therefore respectfully requests that the Commission grant this petition
8 to intervene.

Respectfully submitted this 22nd day of December, 2015.



Etta Lockey
Senior Counsel
PacifiCorp d/b/a Pacific Power