

ELLEN F. ROSENBLUM  
Attorney General



FREDERICK M. BOSS  
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**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

March 31, 2016

VIA ELECTRONIC MAIL ONLY

Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street, Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

Re: *In the Matter of Implementing Energy Storage Program Guidelines pursuant to House Bill 2193*  
OPUC Docket No.: UM 1751  
DOJ File No.: 330030-GN0106-16

Filing Center:

Enclosed for filing with the Commission today is Oregon Department of Energy's PETITION TO INTERVENE in the above-captioned matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. France", is written over the word "Sincerely,".

Renee M. France  
Senior Assistant Attorney General  
Natural Resources Section

Enclosures  
RMF:jrs/#7277578  
c: Diane Broad, ODOE  
Wendy Simons, ODOE

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

UM 1751

In the Matter of )  
 )  
Implementing Energy Storage Program ) PETITION TO INTERVENE  
Guidelines pursuant to House Bill 2193 )  
 )

NAME OF PETITIONER: Oregon Department of Energy ("Department")

ADDRESS: 625 Marion Street N.E., Salem, OR 97301-3737

PHONE NUMBER: (503) 378-4040

FAX NUMBER: (503) 373-7806

E-MAIL ADDRESSES: diane.broad@state.or.us  
wendy.simons@state.or.us

NAME OF COUNSEL FOR PETITIONER: Renee M. France, Senior Assistant Attorney General

COUNSEL'S ADDRESS: Department of Justice, Natural Resources Section, 1162 Court Street N.E., Salem, Oregon, 97301-4096

COUNSEL'S PHONE NUMBER: (503) 947-4520

COUNSEL'S FAX NUMBER: (503) 378-3784

COUNSEL'S E-MAIL ADDRESS: renee.m.france@doj.state.or.us

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION: Not applicable.

## NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

The department plans to participate in workshops convened by the Oregon Public Utility Commission to develop guidelines for proposals by utilities to procure utility-scale energy storage projects, as electric utilities are required to do by House Bill 2193 (2015). The Legislature has declared that is state policy to encourage "the development and use of a diverse array of permanently sustainable energy resources" under ORS 469.010(2)(a). The development of cost-effective energy storage enables utilities to integrate a larger percentage of intermittent renewable energy resources, such as wind and solar, into the electric grid. Energy storage has the potential to provide other grid benefits, such as increased reliability and reduced need for additional resources specifically for the purpose of meeting peak demand. The department has an interest in ensuring that the guidelines adopted by the OPUC provide robust evaluation methods to assess potential system benefits of energy storage procurements under House Bill 2193, both to ensure that the systems procured under the this legislation provide multiple system benefits and to generate useful information to guide future implementation of energy storage systems.

Under ORS 469.030, the department is statutorily charged with the responsibility to collect, evaluate and disseminate information about energy use in Oregon. The department's responsibilities include the preparation of a comprehensive energy plan under ORS 460.060. As part of these responsibilities, under ORS 469.060 the department is charged with making "recommendations for state and local governments to assist in the development and maximum use of cost-effective conservation and renewable resources, consistent with the energy policy stated in ORS 469.010 \* \* \*." (ORS 469.060(3)(c)). In aid of that responsibility, the department "may intervene in any proceeding undertaken by an agency for the purpose of expressing its views as to the effect of an agency action, upon state energy resources and state energy policy." ORS 469.110(2).

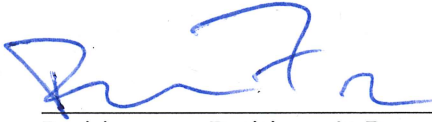
## ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

See description of the ODOE's interest, above.

NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Diane Broad, Oregon Department of Energy, [diane.broad@state.or.us](mailto:diane.broad@state.or.us), (503) 378-4035, 625 Marion Street N.E., Salem, OR 97301-3737 and Wendy Simons, Oregon Department of Energy, [wendy.simons@state.or.us](mailto:wendy.simons@state.or.us), (503) 378-6043, 625 Marion Street N.E., Salem, OR 97301-3737.

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 860-001-300

Petitioner hereby agrees to accept service by electronic mail and waives other forms of service.



Petitioner or Petitioner's Representative



Date