



*Shaping our future with clean energy*

March 28, 2016

**Via Electronic Mail**

Public Utility Commission of Oregon  
Attn: Filing Center  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Re: Interstate Renewable Energy Council, Inc.'s Petition to Intervene  
Docket No. UM 1751

Dear Filing Center:

Interstate Renewable Energy Council, Inc.'s Petition to Intervene is enclosed for filing in the above-referenced docket.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Very truly yours,

INTERSTATE RENEWABLE ENERGY  
COUNCIL, INC.

/s/ Sara Baldwin Auck

Sara Baldwin Auck

Enclosure

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Implementing Energy Storage Program  
Guidelines pursuant to House Bill 2193.

PETITION TO INTERVENE

The Interstate Renewable Energy Council, Inc. ("IREC") 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: Sara Baldwin Auck  
Company: Interstate Renewable Energy Council, Inc.  
Street Address: PO Box 1156  
City, State, Zip: Latham, NY 12110-1156  
Email Address: sarab@irecusa.org  
Telephone: 801-651-7177

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: Sky Stanfield  
Company: Shute, Mihaly & Weinberger LLP  
Street Address: 396 Hayes St.  
City, State, Zip: San Francisco, CA 94102

Email Address: stanfield@smwlaw.com  
Telephone: (415) 552-7272

Name: Allison Johnson  
Company: Shute, Mihaly & Weinberger LLP  
Street Address: 396 Hayes St.  
City, State, Zip: San Francisco, CA 94102  
Email Address: johnson@smwlaw.com  
Telephone: (415) 552-7272

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

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to expand and simplify customer access to reliable and affordable distributed clean energy by: (1) developing and advancing regulatory policy innovations; (2) generating and promoting national model rules, standards, and best practices; and (3) providing workforce training, education, and credentialing. IREC works independently from renewable energy industries, trade associations, technologies, and advocacy organizations to promote the creation of robust, competitive clean energy markets. IREC does not have members.

List of Members attached

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

IREC has a direct, substantial, and unique interest in this proceeding. IREC has a strong interest in development of programs that support integration of distributed energy resources, including energy storage. IREC is actively involved in numerous proceedings across the United States to update interconnection processes to facilitate deployment of energy storage and other distributed energy resources, and their integration on the grid. The scope of IREC's work includes work to ensure regulatory frameworks emphasize the value and flexibility distributed energy storage can provide. IREC seeks to offer its distributed energy storage expertise to stakeholders and the Commission as this proceeding develops.

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

- How to ensure distributed energy storage systems have a clear path to fair and efficient interconnection
- Importance of designing rate structures that send distributed energy storage customers appropriate economic signals
- Ways to open up markets for the full functionality of energy storage, including ancillary services and demand response
- Importance of considering distributed energy storage solutions in the context of broader distribution planning efforts

- How to ensure sufficient, but not duplicative, oversight of distributed energy storage safety
- Other lessons learned and best practices from other states on how to facilitate and incentivize energy storage

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

IREC has worked in nearly forty states to implement successful regulatory policies and programs that have greatly reduced barriers for distributed energy resources. IREC has actively explored best practices in energy storage and published "Deploying Distributed Energy Storage: Near-Term Regulatory Considerations to Maximize Benefits" in 2015. IREC will leverage its knowledge of state and federal storage policies to provide useful, nationally based insight into the Commission's development of a state energy storage program.

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.

/s/ Sara Baldwin Auck  
Petitioner or Petitioner's Representative

March 28, 2016  
Date Signed

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