

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

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION)	PETITION TO INTERVENE OF
OF OREGON.)	NW ENERGY COALITION
)	
Implementing an Energy Storage Program.)	
_____)	

NW Energy Coalition (“NWEC”) 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:	Fred Heutte
Company:	NW Energy Coalition
Street Address:	PO Box 40308
City, State, Zip:	Portland, OR 97240
Email Address:	fred@nwenergy.org
Telephone:	503.757-6222

Please include this contact on the service list.

Petitioner Fred Heutte waives mail service in this proceeding.

2a. The petitioner will not be represented by counsel in this proceeding.

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

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

NW Energy Coalition is a non-profit advocacy organization with membership including more than 110 environmental, civic, and human service organizations, progressive utilities and businesses in Oregon, Washington, Idaho, Montana and British Columbia. We promote development of renewable energy and energy conservation, consumer protection, low-income energy assistance, and fish and wildlife restoration within the Northwest region.

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

Since its formation in 1981, NWEC has focused on affordable and fair energy service and development of energy efficiency and renewable resources. We have participated in numerous proceedings before this Commission and other bodies in the region, as well as legislative, regulatory and public education efforts. Energy storage is an important complement to other efforts advancing clean energy implementation, and this docket will implement the Oregon Legislature's directive, pursuant to HB 2193 (2015), to develop a substantial first-stage energy storage program. No other party can adequately represent NWEC's interests in this proceeding.

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

NWEC intends to participate as a party and raise issues that are appropriate to the proceeding.

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

NWEC has over three decades of experience in public policy concerning energy efficiency and renewable energy development, including regulatory policy, implementation and oversight.

7. Based on the information provided above in accordance with the Commission's rules of procedure, NW Energy Coalition respectfully requests that the Commission grant this Petition to Intervene. NW Energy Coalition's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Fred Heutte

Senior Policy Associate
NW Energy Coalition
fred@nwenergy.org
503.757-6222

Date Signed: September 21, 2015