



Energy
Storage
Association

1800 M Street NW | Suite 400S | Washington, DC 20036

VIA ELECTRONIC DELIVERY

April 11, 2016

TO: Public Utility Commission of Oregon
Attention: Filing Center
PUC.FilingCenter@state.or.us

RE: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON
Implementing an Energy Storage Program
Docket No. UM 1751

The Energy Storage Association's (ESA) petition to intervene in this case is enclosed below. Please do not hesitate to reach out with questions. Thank you for your assistance.

Cheers,

A handwritten signature in black ink, appearing to read 'J. Burwen', with a long, sweeping horizontal stroke extending to the right.

Jason Burwen
Policy & Advocacy Director
Energy Storage Association
202.580.6285
j.burwen@energystorage.org

CC: Active Parties

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of Implementing an Energy
Storage Program

Docket No. 1751
PETITION TO INTERVENE
ENERGY STORAGE ASSOCIATION

The Energy Storage Association hereby petitions to intervene in this proceeding. The following information is offered in support of this petition.

1. Contact information for the petitioner is the following:

Name: Jason Burwen, Policy Director and Jeff Cramer, Consultant
Company: Energy Storage Association
Address: 1800 M Street NW, Suite 400S
City, State, Zip: Washington DC 20036
Email: j.burwen@energystorage.org
Telephone: 202-580-6285

ESA waives physical mail request and would like to be included in email communications

2a. Petitioner will not be represented by counsel.

2b. Additional contacts for this petition include:

Name: Jeff Cramer, Consultant
Company: 38 North Solutions
Address: 1536 Wynkoop St. STE 423
City, State, Zip: Denver, CO, 80218
Email: jeff@38northsolutions.com
Telephone: 202-524-8805

3. The petitioner for this case is an organization and the below describes the organization and its Membership:

ESA members represent a diverse group of entities, including electric utilities, energy service companies, independent power producers, technology developers - - of advanced batteries, flywheels, thermal and compressed air energy storage, pumped hydro, and supercapacitors -- and component suppliers. ESA's members also include researchers who are committed to advancing the state-of-the-art in energy storage solutions and advanced grid operations. A full list of the over 200 ESA members is available on our website. The opinions stated in this filing represent ESA, not necessarily the views of any individual member of the association.

4. The nature and interest of ESA in petitioning here is as follows:

ESA engages in regulatory, legislative and policy efforts and includes leaders in the energy storage marketplace among its members. Member companies have expertise in the grid operations relevant to the integration of large-scale renewable electric generation, as well as firsthand knowledge of the regulatory challenges to financing and operating commercial-scale energy storage facilities for renewables integration. The ESA is looking forward to serving as a resource to the Commission in this CASE 1751 and related cases.

5. Issues ESA will raise in the proceeding:

ESA will participate as a party to this proceeding and will raise issues as necessary.

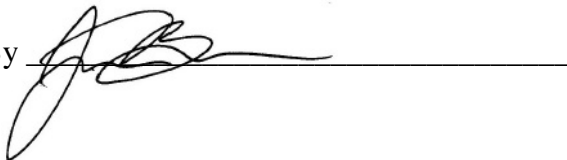
6. Special knowledge that ESA holds in relation to this proceeding:

Is the national trade organization representing industry leaders in the energy storage business sector, ESA will look to ensure the state of energy storage technologies and markets are accurately represented.

7. Based on information above I would officially like to be entered as an intervenor in this case.

RESPECTFULLY SUBMITTED this 11th day of April, 2016.

By



Jason Burwen
Energy Storage Association
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Washington, DC 20036
Phone: 202.580.6285
Email: j.burwen@energystorage.org

CC: Active Parties