



March 28, 2016

**Via Electronic Email**

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

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

Northwest Hydroelectric Association's Petition to Intervene is enclosed for filing in Docket No. UM 1751.

Thank you for your assistance.

Sincerely,

*/s/ Jan Lee*  
Executive Director  
Northwest Hydroelectric Association

**JAN LEE**  
*Executive Director*

PO Box 2517  
Clackamas, OR 97015

**(503) 545-9420**  
(503) 631-7299 Fax

[www.nwhydro.org](http://www.nwhydro.org)  
[jan@nwhydro.org](mailto:jan@nwhydro.org)

*For a list of Directors,  
please visit our  
website.*

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Implementing an Energy Storage Program

PETITION TO INTERVENE

Northwest Hydroelectric Association (NWhA) 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: Jan Lee, Executive Director  
Company: Northwest Hydroelectric Association  
Street Address: PO Box 2517  
City, State, Zip: Clackamas, OR 97015  
Email Address: Jan@NWhydro.org  
Telephone: (503) 545-9420

NWhA waives mail service in this proceeding.

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:  
Company:  
Street Address:

City, State, Zip:  
Email Address:  
Telephone:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

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

NWHA is a non-profit trade association providing educational programs and workshops to its 116 member companies: public and private utilities; cities, water and irrigation districts; engineers, attorneys and other consultants; manufacturers and servicers of industry equipment; private developers; and state and national entities. Our mission is to provides a regional voice for the hydropower industry, representing the needs of membership since 1981. NWHA is dedicated to the "promotion of the region's waterpower as a clean, efficient energy resource while protecting the fisheries and environmental quality which characterize our Northwest region." Our member companies are listed at our website: [www.nwhydro.org](http://www.nwhydro.org). Our membership area includes Alaska, Idaho, Montana, Northern California, Oregon, Washington and Western Canada. The 21 members of the board represent the geographic areas listed and the various disciplines within the industry.

List of Members attached

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

NWHA promotes clean, renewable energy projects in the Northwest. We support the statute as enacted by the Oregon Legislature as a policy that can benefit members throughout the Northwest. Pumped storage hydro energy projects may be as small as 2 MWs and also substantially larger. The ability for these projects to support other renewable energy technologies as a stable integration tool and to provide additional benefits (water storage and conservation, timing of releases of water for instream and out of stream benefits and energy production, etc.) provides another tool in the energy storage protfolio both here in Oregon and throughout the Northwest.

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

NWHA intends to participate as a party to raise issues as necessary and 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:

NWHA has participated in rulemaking and legislation in the State of Oregon during its 35 year existence, working with agencies, such as the Oregon Water Resources Department and the Oregon Department of Energy to develop rules. The Association has also participated in storage dockets in other states. NWHA also participates in national forums regarding renewable energy policy.

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/ Jan Lee

Executive Director, Northwest Hydroelectric Association

Petitioner or Petitioner's Representative

March 28, 2016

Date Signed