

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1887

PORTLAND GENERAL ELECTRIC COMPANY,)	
)	
Complainant,)	
)	
vs.)	MARION COUNTY'S PETITION TO INTERVENE
)	
COVANTA MARION, INC.)	
)	
Respondent.)	
)	
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Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Marion County petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, Marion County provides the following information:

The name and address of Marion County is:

Marion County
Attn: Scott A. Norris
555 Court St NE
PO Box 14500
Salem, OR 97309
Telephone: (503) 588- 5220
E-Mail: SNorris@co.marion.or.us

Sanger Law, PC will represent Marion County in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Scott A. Norris
Marion County
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Telephone: (503) 588- 5220
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Marion County is an Oregon county located south of the Portland metropolitan area that stretches from the Willamette River to the Cascade Mountains encompassing nearly 1,200 square miles. Marion County's mission is to serve the public to protect, and to promote and enhance a positive quality of life for its residents.

Portland General Electric Company's ("PGE") complaint against Covanta Marion, Inc. ("Covanta Marion") addresses the amount and price of electricity that Covanta Marion can sell to PGE under the Public Utility Regulatory Policies Act ("PURPA"). If successful, then the electric revenues available to Covanta Marion may be diminished. This could impact on the economic viability and profitability of Covanta Marion's energy from waste facility.

Without participation, Marion County would not have the ability to participate in the proceeding, which could result in material harm to the County and its residents. First, any harm to Covanta Marion could harm Marion County because Covanta Marion is a

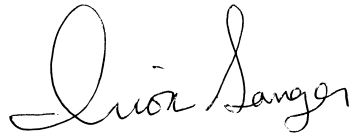
significant employer, and serves the solid waste management needs of the 300,000 people in Marion County. Second, pursuant to a contract with Covanta Marion, Marion County obtains a share of the electric revenues from Covanta Marion's sales to PGE. The outcome of this proceeding could directly and materially impact the electric revenues that Marion County is paid under its contract with Covanta Marion.

Marion County's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. While Marion County has limited experience with the Commission, Marion County's counsel has participated in numerous regulatory proceedings regarding PURPA, including all the recent major proceedings regarding qualifying facility pricing and contract and rate eligibility. Finally, Marion County's interest is not adequately represented by any other party in this proceeding.

WHEREFORE, Marion County respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 18th day of October 2017.

Respectfully submitted,

A handwritten signature in black ink, reading "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

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Attorney for the Marion County