



**IBERDROLA
RENEWABLES**

October 31, 2008

Via Electronic and First Class Mail

Filing Center
Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308-2148

**Re: PUC Docket UM 1394 – Petition to Intervene of IBERDROLA
RENEWABLES, Inc.**

Dear Filing Center:

Enclosed please find an original and one copy of the Petition to Intervene of IBERDROLA RENEWABLES, Inc. (“Iberdrola Renewables”). Iberdrola Renewables waives paper service of documents in this docket.

Sincerely,

Toan-Hao Nguyen
Senior Counsel

cc: Service List
Enclosures

IBERDROLA RENEWABLES, Inc.
1125 NW Couch St., Suite 700
Portland, OR 97209
Telephone (503) 796-7000
www.iberdrolarenewables.us

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1394

In the Matter of)	
)	PETITION TO INTERVENE OF
PUBLIC UTILITY COMMISSION OF)	IBERDROLA RENEWABLES, INC.
OREGON)	
)	
Open an investigation into electric)	
companies providing Qualified Reporting)	
Entity Services for Certification of)	
Renewable Energy Certificates by the)	
Western Renewable Energy Generation)	
Information System.)	

Pursuant to OAR 860-012-0001, IBERDROLA RENEWABLES, Inc. (“Iberdrola Renewables”) petitions to intervene as a “party” in this proceeding.

1. The name and address of the petitioner is:

IBERDROLA RENEWABLES, Inc.
1125 NW Couch Street
Portland, OR 97209
(503) 796-7100

2. The name and address of the attorney representing Iberdrola Renewables is:

Toan-Hao Nguyen, Senior Counsel
IBERDROLA RENEWABLES, Inc.
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Portland, OR 97209
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3. Iberdrola Renewables requests that service of documents also be made on:

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4. Petitioner is a developer, operator, and marketer of electricity, including renewable electricity and renewable energy certificates. Iberdrola Renewables is based in Portland, Oregon and owns or controls the generation output of approximately 900 MW of renewable electric generation in Oregon and Washington.

5. Iberdrola Renewables is an account holder with the Western Renewable Energy Generation Information System (WREGIS). All of Iberdrola Renewables' renewable generating assets in the Western Electric Coordinating Council, totaling over 1,400 MW, are registered with WREGIS.

6. Iberdrola Renewables is establishing Qualified Reporting Entity (QRE) services from the Bonneville Power Administration and the California Independent System Operator in the WECC. The Company has two facilities interconnected with and metered by, an Oregon utility under the jurisdiction of the Commission, who is not yet providing the QRE services for third-parties.

7. Iberdrola Renewables has a significant presence in renewable energy markets in Oregon and the Pacific Northwest, as well as experience with the WREGIS. Iberdrola Renewables therefore has knowledge as an Account Holder and user of QRE services under WREGIS and related trading systems that would assist the Commission in resolving issues in this proceeding. Additionally, Iberdrola Renewables has had experience in utilizing similar tracking systems used in other regions of the nation.

8. For these reasons, Iberdrola Renewables has a direct and substantial interest in these proceedings and will be affected by the outcome.

9. The exact issues Iberdrola Renewables intends to raise in this proceeding are unknown at this time. However, Iberdrola Renewables' appearance will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceedings.

10. Iberdrola Renewables waives paper service of documents.

CONCLUSION

Based upon the foregoing, Iberdrola Renewables respectfully requests the Commission grant this petition to intervene.

DATED: October 31, 2008.



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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the parties of record in this proceeding by first-class mail and electronic mail, addressed to said parties/attorneys' addresses as shown below.

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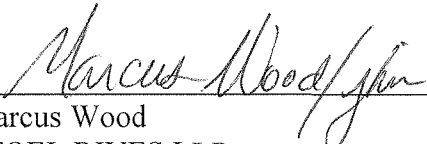
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DATED: October 31, 2008.



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