

# ESLER, STEPHENS & BUCKLEY

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November 5, 2009

Via Electronic and First Class Mail

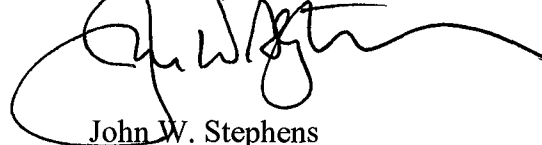
Filing Center  
Public Utility Commission  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of Public Utility Commission of Oregon, Investigation into Pilot Programs to demonstrate the use and effectiveness of Volumetric Incentive Rates for Solar Photovoltaic Energy Systems, PUC Docket No. UM 1452

Dear Filing Center:

Enclosed please find an original and one copy of Petition to Intervene of Renewable Northwest Project.

Yours truly,



John W. Stephens

JWS/mec  
cc: Service List  
Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1452

**In the Matter of** )  
 )  
**PUBLIC UTILITY COMMISSION OF** ) **PETITION TO INTERVENE OF**  
**OREGON** ) **RENEWABLE NORTHWEST PROJECT**  
 )  
 )  
**Investigation into Pilot Programs to** )  
**demonstrate the use and effectiveness of** )  
**Volumetric Incentive Rates for Solar** )  
**Photovoltaic Energy Systems.** )

Pursuant to OAR 860-012-0001, Renewable Northwest Project petitions to intervene as a  
“party” in this proceeding.

1. The name and address of the petitioner is:

Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

2. The name and address of the attorneys representing the petitioner is:

John W. Stephens, Esq.  
Esler, Stephens & Buckley  
888 S.W. Fifth, Suite 700  
Portland, Oregon 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com); [mec@eslerstephens.com](mailto:mec@eslerstephens.com)

3. Petitioner requests that service of documents also be made on:

Ann Gravatt  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

Suzanne Leta Liou  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[suzanne@rnp.org](mailto:suzanne@rnp.org)

4. Petitioner is an advocacy organization whose members include environmental and consumer groups, and businesses who are involved in the development and manufacture of renewable energy projects and products. The purpose of the group is to promote the implementation of environmentally sound, workable renewables in the Northwest.

5. Petitioner and its counsel have appeared in numerous utility Integrated Resource Plan dockets. In addition, Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

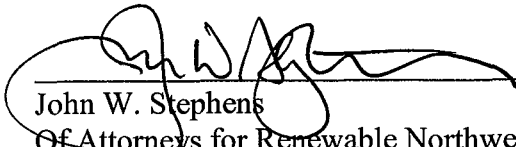
6. Petitioner has sufficient interest in the proceeding, and petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

7. Petitioner waives paper service of documents.

DATED this 5<sup>th</sup> day of November, 2009.

ESLER, STEPHENS & BUCKLEY

By:

  
\_\_\_\_\_  
John W. Stephens  
Of Attorneys for Renewable Northwest  
Project

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **PETITION TO INTERVENE** on the following persons on November 5, 2009, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

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[gordon@oregoncub.org](mailto:gordon@oregoncub.org)  
Citizen's Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

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Citizens' Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
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 by e-mail

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P.O. Box 2148  
Salem, Oregon 97308-2148

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- by first class mail
- by e-mail

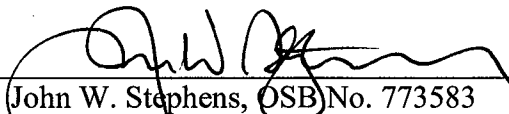
Ann English Gravatt  
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Suzanne Liou  
[suzanne@rnp.org](mailto:suzanne@rnp.org)  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

DATED this 5<sup>th</sup> day of November, 2009.

ESLER STEPHENS & BUCKLEY

By:



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[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)

Of Attorneys for Renewable Northwest Project