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Attorneys for Community Renewable Energy Association

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

|  |                              |
|--|------------------------------|
| IN THE MATTER THE PUBLIC UTILITY )               |                              |
| COMMISSION OF OREGON )                           | CASE NO. UE 235              |
| Investigation Into Avoided Cost Purchases from ) |                              |
| Qualifying Facilities - Schedule 37 )            | PETITION TO INTERVENE OF THE |
| )  | COMMUNITY RENEWABLE          |
| )  | ENERGY ASSOCIATION AND       |
| )  | NOTICE OF WAIVER OF PAPER    |
| )  | SERVICE                      |

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Pursuant to ORS § 756.525 and OAR 860-001-0300, the Community Renewable Energy Association (“CREA”) hereby respectfully petitions to intervene in this proceeding and waives paper service. In support of this Petition, CREA states as follows:

1. The name and address of CREA is:

Community Renewable Energy Association  
Paul Woodin, Executive Director  
1113 Kelly Ave  
Dalles, OR 97058  
[pwoodin@communityrenewables.org](mailto:pwoodin@communityrenewables.org)

2. CREA is a non-profit 190 organization that promotes, educates and advocates for the development of community based renewable energy projects in Oregon.

3. In its efforts to establish a viable market in Oregon for community scale renewable energy projects, CREA has intervened and actively participated in dockets and cases at the Commission regarding the implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978, including UM 1129, UM 1396, UM 1442, and UM 1443. Because PacifiCorp's Advice No. 11-011 would modify the terms under which community renewable energy projects may sell their output to PacifiCorp as qualifying facilities ("QFs"), CREA has a direct and substantial interest in this matter.

4. CREA's participation in this docket will assist the Commission in resolving the issues and will not unreasonably burden the record, delay the proceedings or broaden the issues.

5. Because no other party can adequately represent CREA's interests in this proceeding, CREA respectfully requests that the Commission grant this Petition to Intervene.

6. CREA will be represented in this matter by:

Peter J. Richardson (OSB No. 06668)  
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7. CREA hereby requests that Mr. Woodin, Mr. Richardson, and Mr. Adams be added to the service list in this case, at the addresses set forth above.

8. CREA hereby waives paper service in this docket.

RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of August 2011.

RICHARDSON & O'LEARY PLLC

A handwritten signature in blue ink, appearing to read "Peter J. Richardson", written over a horizontal line.

Peter J. Richardson (OSB No. 06668)  
Gregory M. Adams (OSB No. 101779)  
Attorneys for the Community Renewable  
Energy Association

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 25<sup>th</sup> day of August, 2011, a true and correct copy of the within and foregoing **PETITION TO INTERVENE** was served as shown to:

ED DURRENBERGER  
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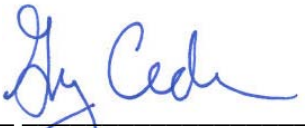
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By:   
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Gregory M. Adams