

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 235**

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON

Investigation Into Avoided Cost Purchases  
from Qualifying Facilities - Schedule 37

Petition to Intervene of Renewable  
Northwest Project and Waiver of  
Paper Service

Pursuant to OAR 860-001-0300(2), Renewable Northwest Project (“RNP”) petitions the Public Utility Commission (“Commission”) to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information for RNP to be included on the service list is:

Megan Walseth Decker  
Renewable Northwest Project  
917 SW Oak Street, Suite 303  
Portland, OR 97205  
(503) 223-4544  
[megan@rnp.org](mailto:megan@rnp.org)

2. RNP will be represented in this proceeding by John W. Stephens of Esler, Stephens & Buckley, LLP. The contact information for RNP’s counsel to be included on the service list is:

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

3. RNP is a non-profit advocacy organization with more than 50 members, including public interest groups and businesses. A list of RNP’s members is attached as Exhibit A. RNP seeks to promote the expansion of environmentally responsible renewable resources across the Northwest region.

4. RNP has a substantial interest in development of renewable resources generally. RNP seeks to promote fair and efficient transmission practices for renewable resources. RNP’s interest in this proceeding will not be represented by any other party.

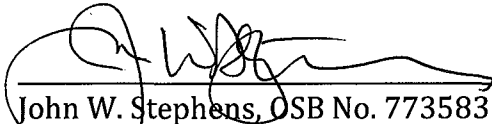
5. RNP has extensive experience with regulatory proceedings involving integrated resource planning, renewable portfolio standard implementation, procurement of renewable resources, and transmission planning and operation, including with Bonneville Power Authority. RNP's counsel has been involved in many general rate cases.

6. RNP's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.

7. RNP waives paper service of documents.

DATED this 12th day of September, 2011.

ESLER, STEPHENS & BUCKLEY

By:   
John W. Stephens, OSB No. 773583  
Of Attorneys for Renewable Northwest  
Project

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**Exhibit A**  
Renewable Northwest Project Members (3/1/11)

3Degrees	NW Energy Coalition
American Wind Energy Assoc.	OSPIRG
Blattner Energy	Port of Vancouver, USA
Bonneville Environmental Foundation	Portland Energy Conservation, Inc.
BP Wind Energy	REC Silicon
Calpine	RES America Developments
Center for Energy Efficiency & Renewable Technologies	Ridgeline Energy
CH2M Hill	Solar Oregon
Citizens' Utility Board	SolarCity
Climate Solutions	Stoel Rives, LLP
Clipper Windpower	SunPower Corporation
Columbia Energy Partners	Tanner Creek Energy
Columbia Gorge Community College	Tonkon Torp LLP
David Evans & Associates	Vestas Americas
E.ON Climate & Renewables	Warm Springs Power & Water Enterprises
Element Power	Washington Environmental Council
Environment Oregon	WashPIRG
Environment Washington	Western Resource Advocates
enXco, Inc.	Western Wind Power
Eurus Energy America	
EverPower	
Gaelectric	
Gamesa Energy USA	
GE Energy	
Geothermal Resources Council	
GL Garrad Hassan	
Green Mountain Energy	
Horizon Wind Energy	
Iberdrola Renewables	
Jones Stevedoring	
Lane Powell PC	
Montana Environmental Information Center	
MontPIRG	
Natural Resources Defense Council	
NaturEner	
NextEra Energy Resources	
Northwest Environmental Business Council	
Northwest Environmental Advocates	

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT AND WAIVER OF PAPER SERVICE** on the following persons on September 12, 2011, 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:

Paul R. Woodin  
[pwoodin@communityrenewables.org](mailto:pwoodin@communityrenewables.org)  
Community Renewable Energy Association  
1113 Kelly Avenue  
The Dalles, Oregon 97058

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

Kenneth Kaufmann, Esq.  
[kaufmann@lklaw.com](mailto:kaufmann@lklaw.com)  
Lovinger Kaufmann, LLP  
825 N.E. Multnomah, Suite 925  
Portland, Oregon 97232-2150

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

Jordan A. White  
[jordan.white@pacificorp.com](mailto:jordan.white@pacificorp.com)  
Senior Counsel  
PacifiCorp  
1407 W. North Temple, Suite 320  
Salt Lake City, Utah 84116

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

PacifiCorp Oregon Dockets  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)  
825 N.E. Multnomah, Suite 2000  
Portland, Oregon 97232

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

Gregory M. Adams, Esq.  
[greg@richardsonandoleary.com](mailto:greg@richardsonandoleary.com)  
Richardson & O'Leary  
515 N. 27th Street  
P.O. Box 7218  
Boise, Idaho 83702

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

Peter J. Richardson  
[peter@richardsonandoleary.com](mailto:peter@richardsonandoleary.com)  
Richardson & O'Leary  
515 N. 27th Street  
P.O. Box 7218  
Boise, Idaho 83702

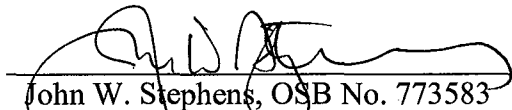
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Megan Walseth Decker  
[megan@rnp.org](mailto:megan@rnp.org)  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205

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

DATED this 12<sup>th</sup> day of September, 2011.

ESLER, STEPHENS & BUCKLEY, LLP

By:   
\_\_\_\_\_  
John W. Stephens, OSB No. 773583  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)  
Of Attorneys for Renewable Northwest Project