

**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**

**RENEWABLE ENERGY  
COALITION'S PETITION TO  
INTERVENE AND WAIVER OF  
SERVICE BY POST**

NAME OF PETITIONER: Renewable Energy Coalition (REC), c/o John R. Lowe  
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NAME OF COUNSEL FOR PETITIONER: Thomas H. Nelson  
COUNSEL'S ADDRESS: PO Box 1211, Welches, OR 97067-1211  
COUNSEL'S PHONE NUMBER: 503.622.3262  
COUNSEL'S FAX NUMBER: 503.622.3562  
COUNSEL'S E-MAIL ADDRESS: nelson@thnelson.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN  
AND THE PURPOSES OF THE ORGANIZATION:

Renewable Energy Coalition is an assumed business name of a coalition of mainly hydroelectric and biomass qualifying facilities. At the present there are approximately 20 members that collectively own approximately 30 projects. Many of those projects have a direct interest power-purchase agreements with PacifiCorp in Oregon, including the terms, conditions, and prices in such contracts as well as the processes whereby the contracts are negotiated and executed.

**NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:**

Petitioner requests full party status in order to address all aspects of the investigation in this docket.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:**

On June 27, 2011, PacifiCorp filed Advice No. 11-011, which proposed revisions to the Company's Oregon Tariff Schedule 37 - Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less ("Advice Filing") to be effective July 27, 2011. REC provided written comments on that Advice Filing and participated in public hearing discussions. On September 6, 2011, the Commission issued an order suspending the Advice Filing for a six-month investigation, effective August 18, 2011. REC has a substantial interest in the outcome of the Commission's investigation because it could affect the terms and conditions of standard form power-purchase agreements and the process for entering into such agreements. Thus this proceeding could directly affect REC's members.

**ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:**

Representatives of Petitioner have been involved in avoided-cost matters in Oregon since the passage of the Public Utility Regulatory Policies Act of 1978, both on behalf of investor-owned utilities and on behalf of cogenerators and small power producers. Petitioner has been admitted as an intervenor with full party status in a number of Commission dockets involving qualifying facilities.

As described above, Petitioner has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and Petitioner may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow Petitioner to intervene in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Petitioner requests to participate in this proceeding as an intervenor with full party status. Petitioner will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001.

The undersigned hereby consents to receipt of all materials related to this docket by electronic transmission to the two email addresses specified above.

DATED: September 20, 2011

Respectfully submitted,

A handwritten signature in black ink that reads "Thomas Nelson". The signature is written in a cursive style with a large, stylized initial 'T'.

Thomas H. Nelson, OSB 78315  
Petitioner's Representative  
PO Box 1211  
Welches, OR 97067-1211  
nelson@thnelson.com

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing RENEWABLE ENERGY COALITION'S PETITION TO INTERVENE on all parties of record as set forth below in this proceeding through electronic filing pursuant to OAR 860-133-0070.

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DATED at Welches, Oregon, this 20th day of September, 2011.



Thomas H. Nelson  
OSB 78315