

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1670

In the Matter of)	
)	
COLUMBIA BASIN ELECTRIC)	
COOPERATIVE, INC. an Oregon)	PETITION TO INTERVENE
electric cooperative corporation)	
)	
v.)	
)	
PACIFIC POWER d/b/a Pacific Power)	
an Oregon corporation,)	
)	
Defendant)	
)	
and)	
)	
NORTH HURLBURT WIND, L.L.C a)	
foreign limited liability company)	
)	
Defendant)	

NAME OF PETITIONER: Oregon Rural Electric Cooperative Association ("ORECA")

ADDRESS: 698 12th St. SE, Suite 210, Salem, OR 97301

PHONE NUMBER (503) 585-9988

FAX NUMBER (503) 585-2147

EMAIL ADDRESSES: tease@oreca.org

NAME OF COUNSEL FOR PETITIONER: Charles Fadeley, General Counsel

COUNSEL'S ADDRESS: PO Box 1408, Sisters, OR 97759

COUNSEL'S PHONE NUMBER: (541) 549-0125

COUNSEL'S FAX NUMBER: (503) 585-2147

COUNSEL'S EMAIL ADDRESS: fade@bendbroadband.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION: Number of members is eighteen and the number of associate members is twenty-eight. The purposes of ORECA are to represent the legislative

and regulatory interests of not-for-profit consumer-owned electric cooperative utilities throughout rural Oregon.

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

Many of ORECA's cooperative utility members have wind, solar and other renewable energy generation resources located in their exclusive service territories. The Commission's determination of whether a renewable energy generation facility can purchase retail or wholesale power and resell that power into the exclusive service territory of electric cooperative's exclusive service territory without violating ORS 758.450 would create a precedent that would have a direct and significant impact to most of ORECA's cooperative members.

ORECA's interests are unique and no other party to this action can represent ORECA's interests.

THE ISSUES THE PETITION INTENDS TO RAISE AT THE PROCEEDING: Unknown at this time.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING: As mentioned previously, many of ORECA's electric cooperative members have renewable energy generation resources located in their exclusive service territory. Those members have first-hand knowledge in providing station service to those generation resources and the contractual and physical arrangements necessary to provide those services. ORECA believe that, for the most part, the Commission is unaware of the impacts that the renewable generation resources have on the operations, safety and finances of local utilities and the potential impact if the Commission permits entities to avoid the territory allocations laws as have North Hurlburt Wind, LLC and Pacific Power.


NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT THE PETITIONER WOULD LIKE TO ADDED TO THE SERVICE LIST IN THIS DOCKET:

Charles Fadeley, General Counsel
Oregon Rural Electric Cooperative Assoc.
PO Box 1408
16975 Green Drake Ct.
Sisters, OR 97759
fade@bendbroadband.com

Ted Case, Executive Director
Oregon Rural Electric Cooperative Assoc.
698 12th St. SE, Ste 210
Salem, OR 97301
tcase@oreca.org

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the records, or unreasonably delay the proceeding. OAR 860-001-300.

Petitioner hereby agrees to accept service by electronic mail and waives other forms of service.



Charles Padeley, General Counsel for Petitioner

10/22/13
Date

CERTIFICATE OF SERVICE

I hereby certify that on the 23 day of October, 2013, I served the foregoing PETITION TO INTERVENE upon the persons named on the service list, by mailing a full, true and correct copy thereof to such persons waiving such service by mail who were served at their email address as listed on the service list.

W

Jerry Healy, Manager
COLUMBIA BASIN ELECTRIC
COOPERATIVE, INC.
PO Box 398
Heppner, OR 97836-0398
jerryh@columbiabasin.co

W

John Cameron
DAVIS WRIGHT TREMAN, LLP
1300 SW Fifth Ave, Ste 2300
Portland, OR 97201
johncameron@dwt.com

W

Derek Green
DAVIS WRIGHT TREMAN, LLP
1300 SW Fifth Ave, Ste 2300
Portland, OR 97201
derekgreen@dwt.com

W

Raymond S. Kindley
KINDLEY LAW, PC
PO Box 569
West Linn, OR 97068
kindleylaw@comcast.net

W

Michelle R. Mishoe, Legal Counsel
PACIFIC POWER
825 NE Multnomah, Ste 1800
Portland, OR 97232

W

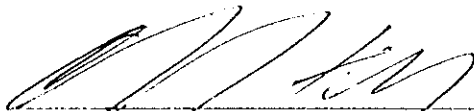
PACIFICOR, DBA PACIFIC POWER
Oregon Dockets
825 NE Multnomah, Ste 1800
Portland, OR 97232

michelle.mishoc@pacificorp.com

oregondocket@pacificorp.com

W=waives paper service

DATED: October 23, 2013



Charles Fadeley, OSB # 812194
ORECA General Counsel