

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1681

In the Matter of

PACIFICORP dba PACIFIC POWER

2015-2019 Renewable Portfolio Standard  
Implementation Plan.

PETITION TO INTERVENE

Renewable Northwest Project petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Megan Decker  
Company: Renewable Northwest Project  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: megan@rnp.org  
Telephone: 503-223-4544

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is listed under #1, above.

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: RNP Dockets  
Company: Renewable Northwest Project  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: dockets@rnp.org  
Telephone: 503-223-4544

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

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

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

In pursuit of its mission to expand environmentally responsible, new renewable resources, RNP was a leading advocate for Oregon's Renewable Portfolio Standard and remains keenly interested in ensuring its successful implementation and in promoting public understanding of the policy's impact.

5. The issues the Petitioner intends to raise at the proceeding are:

RNP intends to review and possibly comment on the implementation plan, but has not yet precisely defined the issues it will raise.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

RNP staff are involved in Renewable Portfolio Standard implementation and compliance reporting across the region.

7. 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 record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Megan Decker  
Petitioner or Petitioner's Representative

1/7/14  
Date Signed

## Exhibit A

### Renewable Northwest Project Members (January 2014)

3Degrees	Natural Resources Defense Council
American Wind Energy Assoc.	NextEra Energy Resources
Atkins	Northwest Environmental Business Council
Blattner Energy	NW Energy Coalition
Bonneville Environmental Foundation	OneEnergy Renewables
BP Wind Energy	Oregon Solar Energy Industries Association
Calpine Corporation	Oregon Tech
Center for Energy Efficiency & Renewable Technologies	OSPIRG
Christenson Electric	Portland Energy Conservation, Inc.
Citizens' Utility Board	REC Silicon
Climate Solutions	REpower USA
Clipper Windpower Development	RES America Developments, Inc.
Columbia Gorge Community College	Solar Oregon
Community Renewable Energy Association	SolarCity
E.ON Climate & Renewables	Stoel Rives, LLP
Ecofys	SunPower Corporation
EDF Renewable Energy	SWCA Environmental Consultants
EDP Renewables North America LLC	Tonkon Torp LLP
Element Power	Vestas Americas
Environment Oregon	Warm Springs Power & Water Enterprises
Environment Washington	Washington Environmental Council
Eurus Energy America	WashPIRG
First Wind	Western Resource Advocates
Gaelectric	
Gamesa Energy USA	
GE Energy	
Geothermal Resources Council	
GL Garrad Hassan	
Green Mountain Energy Company	
HDR Engineering, Inc.	
Iberdrola Renewables	
Jones Stevedoring Company	
K&L Gates	
Kapla Law PLLC	
MAP	
Montana Environmental Information Center	
MontPIRG	
Natural Capital Partners	

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served the foregoing PETITION TO INTERVENE upon the following parties on the service list for UM 1681, via electronic mail, on January 7, 2014:

RENEWABLE NORTHWEST PROJECT

By: /s/ Megan Walseth Decker  
Megan Walseth Decker, OSB No. 034878  
megan@rnp.org

<b>W</b>	<b>DAVISON VAN CLEVE</b> IRION A SANGER <b>(C)</b> ASSOCIATE ATTORNEY	333 SW TAYLOR - STE 400 PORTLAND OR 97204 ias@dvclaw.com
<b>W</b>	<b>PACIFICORP</b> WILLIAM GRIFFITH VICE PRESIDENT, REGULATION	825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 bill.griffith@pacificorp.com
	ETTA LOCKEY ASSOCIATE COUNSEL	825 NE MULTNOMAH ST., STE 1800 PORTLAND OR 97232 etta.lockey@pacificorp.com
<b>W</b>	<b>PUBLIC UTILITY COMMISSION OF OREGON</b> RYAN BRACKEN <b>(C)</b> SR. UTILITY ECONOMIST	PO BOX 1088 SALEM OR 97308-1088 ryan.bracken@state.or.us
<b>W</b>	<b>PUC STAFF--DEPARTMENT OF JUSTICE</b> JASON W JONES ASSISTANT ATTORNEY GENERAL	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us