

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

DR 48

IN THE MATTER RENEWABLE ENERGY )	
COALITION: PETITION FOR )	PETITION TO INTERVENE OF THE
DECLARATORY RULING )	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(4) and -0430(3), 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  
c/o Don Coats (W)  
Executive Board Chair  
1113 Kelly Ave  
Dalles, OR 97058  
[doncoats@hotmail.com](mailto:doncoats@hotmail.com)

2. CREA will be represented in this matter by:

Peter J. Richardson (OSB No. 06668) (W)  
Gregory M. Adams (OSB No. 101779) (W)  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
Boise, Idaho 83702  
Telephone: (208) 938-2236  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

3. CREA hereby requests that Mr. Coats and Mr. Adams be added to the service list in this case, at the addresses set forth above. CREA hereby waives paper service in this docket.

4. CREA is an Oregon Rev. Stat. Ch. 190 intergovernmental association. *See* ORS §§ 190.003- 190.118. CREA consists of local governments seeking to promote locally-owned renewable energy projects for all forms of renewable generation recognized in Oregon’s Renewable Portfolio Standard (biomass, geothermal, hydropower, ocean thermal, solar, tidal, wave, wind and hydrogen). CREA is comprised of several Oregon counties which provide active participation through their county commissioners, including Sherman, Wasco, Gilliam, Harney, Hood River, Morrow, Polk, Union, Wheeler, and Wallowa. In addition to these counties, CREA’s current membership includes the Mid-Columbia Council of Governments, Columbia Gorge Community College, and seventeen business and non-profit organizations who have interest in a viable community renewable energy sector for Oregon.

5. In its efforts to establish a viable market in Oregon for community renewable energy projects, CREA has intervened and actively participated in dockets and cases at the Public Utility Commission of Oregon (“Commission”) regarding the implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978, including dockets UM 1129, UM 1396, UM 1442, UM 1443, UE 245, and UM 1610. Because the terms under which community renewable energy projects may sell their output to an Oregon utility as qualifying facilities (“QFs”) under the Commission’s standard contract is at issue in this proceeding, CREA has a direct and substantial interest in this matter.

6. As required by OAR 860-001-0300(4), CREA asserts as follows:

- (a) CREA accepts the statement of facts as set forth in and for purposes of the petition for declaratory ruling; and
- (b) CREA accepts the statement of questions presented in the petition for

declaratory ruling.

7. 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.

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

DATED this 18<sup>th</sup> day of February, 2014.

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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Of Attorneys for the Community Renewable  
Energy Association

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18<sup>th</sup> day of February, 2014, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF COMMUNITY RENEWAL ENERGY ASSOCIATION IN DOCKET DR 48** was served as follows:

BRITTANY ANDRUS  
OREGON PUBLIC UTILITIES  
COMM.  
PO Box 1088  
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Hand Delivery  
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Signed: */s/ Gregory M. Adams*

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Gregory M. Adams