

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1725

In the Matter of

IDAHO POWER COMPANY,

Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar Integration Charge, and for Change in Resource Sufficiency Determination.

PETITION TO INTERVENE OF
RENEWABLE NORTHWEST

Pursuant to ORS § 756.525 and OAR 860-001-0300, Renewable Northwest respectfully petitions the Public Utility Commission of Oregon (the “Commission”) 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: Dina Dubson Kelley
Company: Renewable Northwest
Street Address: 421 SW 6th Ave, Suite 1125
City, State, Zip: Portland, OR, 97204
Email Address: dina@RenewableNW.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: Renewable NW Dockets
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 1125
City, State, Zip: Portland, OR 97204
Email Address: dockets@RenewableNW.org
Telephone: 503-223-4544

Name: Michael O’Brien
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 1125

City, State, Zip: Portland, OR 97204
Email Address: michael@RenewableNW.org
Telephone: 503-223-4544

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

Renewable NW is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. The common goal of Renewable NW's members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment.

List of Members attached

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

Renewable NW has participated in numerous regulatory proceedings related to PURPA, QFs, avoided costs, and integrated resource planning in Oregon and throughout the Northwest. Idaho Power's application could have a substantial impact on how PURPA is implemented in Oregon with respect to wind and solar QFs, which in turn, could directly impact the development of such QFs in Idaho Power's service territory. Several of Renewable NW's members are QF developers that are active in Oregon; thus, Renewable NW has a direct and substantial interest in this proceeding. No other party can adequately represent Renewable NW's interests in the proceeding.

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

Renewable NW intends to participate as a party and is intervening at this stage in order to participate in the briefing portion of the proceeding. To that end, Renewable NW will be filing a prehearing brief together with the NW Energy Coalition. Renewable NW does not intend to raise any new issues or otherwise broaden the scope of the proceeding in any way, and Renewable NW accepts both the record and schedule as they currently stand.

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

Renewable NW has a long history of participating in regulatory proceedings related to the development and integration of renewable energy projects, including renewable QFs under PURPA. Of particular relevance to this proceeding, Renewable NW is a party to UM 1610, and Phase I of that proceeding addressed the issues proposed for the Commission's consideration in this docket. Renewable NW is also a party to UM 1734 and submitted public comments in connection with Idaho Power's application before the Idaho Public Utilities Commission to shorten the QF contract length in its Idaho service territory. Renewable NW staff is also serving on Idaho Power's Technical Review Committee in connection with its Solar Integration Study.

7. ORS § 756.525 provides that the Commission may permit any person to become a party before the final taking of evidence in the proceeding. Renewable NW respectfully requests to intervene before the final taking of evidence in this proceeding for the purpose of submitting one or more legal briefs. Internal staffing changes made it difficult for Renewable NW to intervene earlier in the proceeding. As stated above, Renewable NW does not intend to raise any new issues or otherwise broaden the scope of the proceeding in any way. Renewable NW accepts the schedule and the record as they currently stand. Thus, Renewable NW's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Dina Dubson Kelley

Chief Counsel, Renewable Northwest

dina@RenewableNW.org

503-223-4544

11/12/2015

Date Signed

Exhibit A

Renewable Northwest Members (November 2015)

3Degrees	NW Energy Coalition
American Wind Energy Assoc.	OneEnergy Renewables
Atkins	Oregon Solar Energy Industries Association
Blattner Energy	Oregon Tech
Bonneville Environmental Foundation	Orion Renewable Energy Group LLC
Center for Energy Efficiency & Renewable Technologies	OSPIRG
Christenson Electric	PECI
Citizens' Utility Board	Principle Power
Climate Solutions	REC Silicon
Columbia Gorge Community College	RES America Developments, Inc.
Community Renewable Energy Association	Solar Oregon
DNV GL	Stoel Rives, LLP
EDF Renewable Energy	SunPower Corporation
EDP Renewables North America LLC	SWCA Environmental Consultants
Environment Oregon	Tonkon Torp LLP
Environment Washington	Vestas Americas
Eurus Energy America	Warm Springs Power & Water Enterprises
EverPower	Washington Environmental Council
First Wind	WashPIRG
GE Energy	Western Resource Advocates
Geothermal Resources Council	
Green Mountain Energy Company	
HDR Engineering	
Iberdrola Renewables	
Idaho Conservation League	
Invenergy	
K&L Gates	
Kapla Law PLLC	
MAP	
Montana Environmental Information Center	
MontPIRG	
Natural Capital Partners	
Natural Resources Defense Council	
NextEra Energy Resources	
Northwest Environmental Business Council	
Northwest SEED	