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May 18, 2015

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: *In the Matter of Idaho Power Company*
Docket No. UM 1725

Dear Filing Center:

Enclosed please find the original Petition to Intervene on behalf of Pacific Northwest Solar, LLC in the above-referenced docket.

Respectfully submitted,

/s/Ryan N. Meyer

Ryan N. Meyer
Managing Member, VP of Operations, and
Representative of Pacific Northwest Solar, LLC

Enclosure

1 Ryan N. Meyer
2 Managing Member, VP of Operations
3 and authorized Representative of
4 Claimant Pacific Northwest Solar, LLC
5 (458) 205-5870
6 ryan.meyer@pacificnorthwestsolar.net
7 8221 King Road
8 Loomis, CA 95650

9
10 **BEFORE THE PUBLIC UTILITY COMMISSION**
11
12 **OF OREGON**

13 In the Matter of
14 IDAHO POWER COMPANY
15
16 Motion for Temporary Stay of Its Obligation to
17 Enter Into New Power Purchase Agreements
18 With Qualifying Facilities

Docket No. UM 1725

**PACIFIC NORTHWEST SOLAR, LLC'S
PETITION TO INTERVENE**

19 Pacific Northwest Solar, LLC (“PNW”) hereby petitions the Oregon Public Utility
20 Commission (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, to intervene in
21 the above captioned proceeding and to appear and participate as a party. In support of its petition,
22 PNW states all of the following:

23 1. The name and address of the Intervenor is:

24 Pacific Northwest Solar, LLC
25 PO Box 4120, #33304
26 Portland, OR 97208
27 Loomis, CA 95650
28 (458) 205-5870

29 2. PNW will be represented in this docket by its authorized representative:

30 Ryan N. Meyer, VP of Operations
31 8221 King Road
32 Loomis, CA 95650
33 (530) 320-4074
34 ryan.meyer@pacificnorthwestsolar.net

1 3. Copies of all pleadings, production requests, production responses, Commission
2 Orders and other documents in this proceeding should be provided to the following:

3 Ryan N. Meyer
4 8221 King Road
5 Loomis, CA 95650
6 (530) 320-4074
7 ryan.meyer@pacificnorthwestsolar.net

8 4. PNW will be affected by the outcome of this proceeding and its interests cannot be
9 adequately represented by any other party to this matter.

10 5. As background, PNW is a regional developer of utility scale solar projects in
11 Eastern Oregon. PNW is the direct owner and developer of nine (9) Qualifying Facility solar
12 energy projects, all located in Malheur County. For each of its projects, PNW has submitted
13 Small Generator Interconnection Applications (“SGIAs”) and Energy Sales Agreement
14 applications (“ESA applications”) to Idaho Power Company (“Idaho Power”) pursuant to Oregon
15 Schedule 85 standard ESA program (Tariff E-27).

16 6. In lieu of providing a proposed ESA for each of the projects submitted as required
17 by Schedule 85, Idaho Power informed PNW that it unilaterally chose to deviate from the
18 Schedule 85 protocol and simply “responded” by filing the instant request for relief with the
19 Commission (which is really no response at all). Although PNW sought, informally, to have
20 Idaho Power honor its Schedule 85 obligations, such efforts were met with further protests by
21 Idaho Power (again, relying on the erroneous premise that simply filing a Request for a Stay was
22 the functional equivalent of a Stay). PNW thereafter initiated its own Complaint against Idaho
23 Power with this Commission (Docket UM 1731).

24 7. Thereafter, Idaho Power supplemented its filings in this docket, specifically calling
25 out the applications made by PNW (*see* Idaho Power’s Supplement to Motion for Temporary Stay,
26 2:19-26 – though the filing misstates PNW’s total power generation application value). This
27 clearly evidences that even Idaho Power sees PNW as a key player in its filings with the
28 Commission.

