

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1728

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) RENEWABLE ENERGY COALITION
COMPANY,) PETITION TO INTERVENE
)
)
Application to Update Schedule 201)
Qualifying Facility Information.)
)
)
_____)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“REC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, REC provides the following information:

The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent REC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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REC was established in 2009, and is comprised of about forty members that are small qualifying facilities (“QFs”) who own and operate about fifty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, special service districts, corporations, cooperatives, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts.

Portland General Electric Company’s (“PGE”) filing could have a substantial impact on REC’s members. The Commission opened this docket to review PGE’s annual avoided cost rate changes, including the utility’s 2016 update. REC submitted comments in opposition to the 2015 update, and is submitting comments regarding the 2016 update. Depending on the specific filings, REC may also be involved in future PGE avoided cost rate filings.

REC’s members have power purchase agreements (“PPAs”) with Oregon investor owned electric utilities with rates based on the utilities’ avoided costs. REC’s members also sell power to Idaho Power and PacifiCorp in Idaho, Washington, Wyoming, and Utah. Most of REC’s members are existing projects that have operating and selling to Oregon utilities for numerous years. In addition, REC’s members purchase back up, station service, and other electrical needs from utilities. This proceeding could impact the avoided cost rates paid to REC’s members. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and

Oregon. REC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities. REC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, REC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 31st day of May 2016.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition