

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1818

COLUMBIA BASIN ELECTRIC
COOPERATIVE, INC., an Oregon cooperative
corporation,

Complainant,

v.

UMATILLA ELECTRIC COOPERATIVE,
INC., an Oregon cooperative corporation,

Defendant.

WHEATRIDGE WIND ENERGY, LLC'S
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Wheatridge Wind Energy, LLC (“Wheatridge Wind”) hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(6). In support of this Petition to Intervene, Wheatridge Wind states as follows:

1. The name and address of Wheatridge Wind as a party of record in this proceeding is:

Jerry Rietmann
Wheatridge Wind Energy, LLC
P.O. Box 133
245 W. Main Street, Suite 200
Ione, Oregon 97843
ellaresources@wildblue.net
(541) 571-3005

Mr. Rietmann should be included on the service list.

2. Wheatridge Wind will be represented by counsel in this proceeding. The contact information for Wheatridge Wind’s counsel to be included on the service list is:

John Cameron
Derek Green
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201-5610
derekgreen@dwt.com
johncameron@dwt.com
Ph: (503) 241-2300

3. Wheatridge Wind requests to intervene in this proceeding for the following reasons:

Wheatridge Wind is developing a wind powered generation facility that will have a maximum nominal generating capacity of 500 MW, to be located in Morrow and Umatilla Counties (the "Project"). The Project is anticipated to include facilities located in both Columbia Basin Electric Cooperative, Inc.'s ("CBEC") and Umatilla Electric Cooperative, Inc.'s ("UEC") service territories. Wheatridge has requested that UEC interconnect with the Project and provide transmission service to a substation owned and operated by the Bonneville Power Administration's ("BPA"). As framed by CBEC's Complaint and UEC's Answer, this proceeding will have a direct effect on Wheatridge Wind's Project. Wheatridge Wind has a significant interest in protecting and ensuring its rights in this regard.

No other party in this proceeding fully represents Wheatridge Wind's interests. Wheatridge Wind plans to participate in this proceeding, including providing legal arguments through briefing on those issues that directly affect its interests, and participating in the hearing if necessary. Wheatridge Wind's participation, however, will not unreasonably broaden the issues, unduly burden the record, or delay the proceedings.

To date, there is no deadline for parties to intervene in this matter set by the Commission. The record has not yet closed in this matter and intervention at this time is therefore still appropriate.

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4. Request to Intervene:

Wherefore, Wheatridge Wind requests leave to intervene and all the rights of a party in this proceeding.

DATED this 27th day of February 2017.

DAVIS WRIGHT TREMAINE LLP

By: /s/ Derek D. Green

Derek D. Green, OSB #042960

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Of Attorneys for Intervenor

Wheatridge Wind Energy, LLC