

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL )  
ELECTIC COMPANY, Draft Storage Potential )  
Evaluation ) CASE NO. UM 1856  
 )  
 ) PETITION TO INTERVENE OF THE  
 ) COMMUNITY RENEWABLE ENERGY  
 ) ASSOCIATION  
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Pursuant to ORS 756.525 and OAR 860-001-0300, the Community Renewable Energy Association (“CREA”) hereby respectfully petitions the Public Utility Commission of Oregon (“OPUC” or “Commission”) to grant CREA intervenor status in this proceeding. In support of this Petition, CREA states as follows:

1. The name and address of CREA is:

Community Renewable Energy Association  
c/o Brian Skeahan  
1113 Kelly Ave  
Dalles, OR 97058  
Email: Brian.skeahan@yahoo.com

2. CREA will be represented in this proceeding by Peter J. Richardson (OSB No. 066687) and Gregory M. Adams (OSB No. 101779), of the law firm Richardson Adams, PLLC.

3. All documents relating to this proceeding should be served on the following persons:

Gregory M. Adams (OSB No. 101779)  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
Boise, Idaho 83702  
Telephone: 208-938-2236  
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Brian Skeahan  
PMB 409  
18160 Cottonwood Rd.  
Sun River, Oregon 97707  
Telephone: 360-431-5072  
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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, Curry, and Wallowa. In addition to these counties, CREA’s current membership includes the Mid-Columbia Council of Governments, Columbia Gorge Community College, and 25 irrigation districts, businesses, individuals 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-scale renewable energy projects, CREA has intervened or otherwise actively participated in dockets at the Commission regarding the implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978 (“PURPA”), including OPUC dockets UM 1129, UM 1396, UM 1442, UM 1443, UE 245, UM 1610, UM 1794, UM 1802 and DR 46. CREA has also intervened or actively participated in proceedings before the Federal Energy Regulatory Commission (“FERC”) that affect Oregon qualifying facilities (“QFs”), including dockets RM13-2 (regarding small generator interconnection rules), EL15-6 & EL16-16 (*PaTu Wind Farm, LLC v. Portland General Electric Co.*), and AD16-16 (Implementation Issues Under the Public Utility Regulatory Policies Act of 1978).

6. Due to its direct connection to facilitating renewable energy development, CREA also has an interest in policies implement energy storage. For this reason, CREA petitioned

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to intervene and was granted party status in the precursor to this docket regarding storage facilities, UM 1751. CREA's members and stakeholders possess information and knowledge regarding energy storage that would be of assistance to the Commission in this proceeding.

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.

RESPECTFULLY SUBMITTED on November 21, 2017.

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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