

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1857

In the Matter of

PACICORP, dba PACIFIC POWER,

Draft Storage Potential Evaluation.

PETITION TO INTERVENE OF
RENEWABLE NORTHWEST

Renewable Northwest petitions 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: Silvia Tanner
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 975
City, State, Zip: Portland, OR 97204
Email Address: silvia@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 Northwest Dockets
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 975
City, State, Zip: Portland, OR 97204
Email Address: dockets@renewablenw.org
Telephone: 503-223-4544

Name: Cameron Yourkowski
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 975
City, State, Zip: Portland, OR 97204
Email Address: cameron@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 Northwest is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. Renewable Northwest has 57 member organizations that include renewable energy developers and manufacturers, as well as consumer advocates, environmental groups, academic institutions, and other industry advisers. The common goal of Renewable Northwest'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:

In pursuit of our mission to advocate for the expansion of environmentally renewable energy resources in the Northwest, Renewable Northwest was involved in the adoption of HB 2193 and is keenly interested in ensuring its successful implementation to promote the development of a cost-effective, reliable, and clean energy system. We also participated in workshops and submitted several rounds of comments in Docket No. UM 1751. Finally, we are active participants in regional discussions about the integration of renewable energy sources, and have members actively pursuing storage projects in the Northwest. No other party can adequately represent Renewable NW's interest in this proceeding.

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

Renewable Northwest intends to participate as a party and raise issues that are appropriate to the proceeding.

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

Renewable Northwest is a regular public interest participant in Commission proceedings. We have expertise, and have been active, in renewable energy integration issues for years. Additionally, we participated in UM 1751 as well as in storage dockets in other states.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Northwest respectfully requests that the Commission grant this Petition to Intervene. It is in the public interest to allow Renewable Northwest to intervene in this proceeding. Moreover, Renewable Northwest's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Respectfully submitted this 10th day of November, 2017.

/s/ Silvia Tanner

Silvia Tanner

Staff Counsel

silvia@renewableNW.org

Exhibit A
Renewable Northwest Members (November 2017)

3Degrees	Oregon Tech
7Skyline, LLC	Orion Renewable Energy Group LLC
174 Power Global	Scout Clean Energy
American Wind Energy Association	Sempra Renewables
Avangrid Renewables	Solar Oregon
Bonneville Environmental Foundation	Spark Northwest
Center for Energy Efficiency & Renewable Technologies	Stoel Rives, LLP
Citizens' Utility Board of Oregon	Sulus Solar
Climate Solutions	SunPower Corporation
Columbia Gorge Community College	SWCA Environmental Consultants
Community Renewable Energy Association	Tetra Tech
Cypress Creek Renewables	Vestas Americas
Davis Wright Tremaine	Warm Springs Power & Water Enterprises
DNV GL	Washington Environmental Council
EDF Renewable Energy	WashPIRG
EDP Renewables North America LLC	Western Resource Advocates
Environment Oregon	
Environment Washington	
Erica Nist-Lund, Attorney	
Eurus Energy America	
EverPower	
GE Energy	
Geothermal Resources Council	
Green Mountain Energy Company	
HDR Engineering, Inc.	
Idaho Conservation League	
Invenergy	
K&L Gates	
Kapla Law PLLC	
Latitude45 Associates	
MAP	
Montana Environmental Information Center	
MontPIRG	
National Grid	
Natural Resources Defense Council	
NextEra Energy Resources	
Northwest Environmental Business Council	
NW Energy Coalition	
OneEnergy Renewables	
Oregon Solar Energy Industries Association	
OSPIRG	