

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1931**

PORTLAND GENERAL ELECTRIC	)	
COMPANY,	)	
	)	
Complainant,	)	COMMUNITY RENEWABLE
	)	ENERGY ASSOCIATION'S
v.	)	PETITION TO INTERVENE
	)	
ALFALFA SOLAR I LLC, et al.	)	
	)	
Defendants.	)	
_____	)	

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

The name and address of CREA is:

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

Sanger Law, PC will represent CREA 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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CREA was established in 2007 and is an 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.

CREA has a substantial interest in this proceeding because the Commission's interpretation of its standard contract provisions regarding whether a QF is paid the full fifteen years of fixed prices can substantially impact its members. In addition, CREA

previously filed a complaint against PGE because PGE was interpreting its standard contract to provide less than fifteen years of fixed prices, in contravention of the Commission's policies. The Commission did not interpret any specific standard contract, but affirmed that its policy, with respect to the commencement date for the 15-year period of fixed prices, is that the 15-year term must commence on the date of power delivery to provide a QF the full benefit of the fixed price requirement. CREA's interests are not be adequately represented by any other party in this proceeding.

CREA has participated in numerous regulatory proceedings related to the Public Utility Regulatory Policies Act. CREA's legal counsel has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities, including PGE. CREA'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, CREA 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 20th day of July 2018.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned above a horizontal line.

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Of Attorneys for the Community Renewable  
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