

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1931**

PORTLAND GENERAL ELECTRIC	)	
COMPANY,	)	
	)	
Complainant,	)	RENEWABLE ENERGY
	)	COALITION'S
v.	)	PETITION TO INTERVENE
	)	
ALFALFA SOLAR I LLC, et al.	)	
	)	
Defendants.	)	
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Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“Coalition”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, Coalition provides the following information:

The name and address of Coalition is:

Renewable Energy Coalition  
John Lowe  
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Sanger Law, PC will represent Coalition 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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The Coalition was established in 2009, and is comprised of over thirty members that are both small and large qualifying facilities (“QFs”) who own and operate approximately fifty renewable energy generation facilities in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts, but the membership includes biomass, solar, geothermal, and waste energy. Most of the Coalition’s members operate existing projects that have been operating and selling to Oregon utilities for numerous years, but many of the members are developing or planning to develop new projects.

Coalition 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, Coalition 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

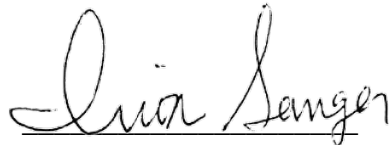
its policy, with respect to the commencement date for the 15-year period of fixed prices, is that the 15-year term must commence on the date of power delivery to provide a QF the full benefit of the fixed price requirement. Coalition's interests are not be adequately represented by any other party in this proceeding.

Coalition has participated in numerous regulatory proceedings related to the Public Utility Regulatory Policies Act. Coalition's legal counsel has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities, including PGE. Coalition'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, Coalition 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 6th day of July 2018.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition