

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1673

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Report to the Legislature on
Effectiveness of Incentive Programs for
Solar Photovoltaic Energy

OREGONIANS FOR RENEWABLE
ENERGY PROGRESS'S APPLICATION
FOR CASE CERTIFICATION

Pursuant to OAR 860-001-0120(4) and Article 5.3 of the First Amended and Restated Intervenor Funding Agreement (“IFA”), Oregonians for Renewable Energy Progress (“OREP”) hereby applies for case certification in order to receive an issue fund grant. Accompanying this application are OREP’s Notice of Intent to Request an Issue Fund Grant and OREP’s Motion to Intervene.

1. In 2013, the Oregon Legislature passed HB 2893, which directed the Commission to study the effectiveness of programs that provide incentives for the use of solar photovoltaic energy systems. As part of the study, the Commission is directed to investigate the resource value of solar energy, investigate the costs and benefits of the programs for retail electricity consumers, identify barriers within the programs to providing incentives for the development of solar energy systems and make recommendations for modifying the programs or establishing new programs for the

purpose of providing incentives for the development of solar photovoltaic energy systems.

2. Portland General Electric (“PGE”) and PacifiCorp are “Participating Public Utilities” as defined by Article 1(k) of the IFA and UM 1673 is an “Eligible Proceeding” as define in Article 1(c) of the IFA.

3. OREP is an Oregon nonprofit corporation with approximately 900 members, including renewable energy interest groups, small customer generators who are participants in the above-mentioned incentive programs for retail electricity consumers, and many more prospective participants in modified or successor programs. These customer generators purchase electricity from PGE and PacifiCorp and are alternatively either credited for their photovoltaic electricity generation through net metering or are compensated on a per kilowatt hour basis through the solar pilot program. Prospective participants have a keen interest in modified or successor programs, as the design of those programs may determine whether or not they will become eligible to participate and whether distributed generation of photovoltaic energy will be economically feasible. OREP’s members also include non-participant ratepayers who want a greater share of their electricity to come from local, distributed renewable resources.

These program participants and non-participant ratepayers have a direct and substantial interest in these proceedings and they will not be adequately represented by any other party.

4. OREP meets each of the criteria for grant eligibility set forth in OAR 860-001-0120 and Articles 5.3(a-g) of the IFA:

(a) OREP is a not for profit corporation. OREP is comprised of many customers of PGE and PacifiCorp and a primary purpose of OREP is to represent these customers' interests in the setting of rates and solar photovoltaic incentive program design.

(b) OREP represents the interests of a broad class of customers. Its participation in UM 1673 will be primarily directed at public utility renewable energy program design and the resulting rates and terms of service affecting those customers. Accordingly, OREP's participation will be directed at future rates and terms of service affecting the entire class of customers participating in incentive programs for solar photovoltaic energy.

(c) OREP is able to effectively represent the program participants in PGE's and PacifiCorp's incentive programs for solar photovoltaic energy. OREP was active in the passage of HB 3039, which gave rise to the solar pilot program, represented the interests of customer generators in AR 538 and UM 1452 and advocated effectively for their interests in the passage of HB 2893. OREP staff have expertise in solar photovoltaic incentive program design and have consistently and effectively represented the interests of customer generator incentive program participants.

(d) Essentially all of OREP's members are customers of either PGE or PacifiCorp. OREP is member supported and nearly all of its funding comes from the donations of members.

(e) As noted in (c) above, OREP has demonstrated in past Commission proceedings its ability to substantively contribute to the record on behalf of customer generators with respect to rates paid for solar photovoltaic energy, and the terms and conditions of service of incentive programs. OREP also intends to retain the services of solar resource value rate experts to conduct studies and present testimony and/or participate in hearings. Therefore, OREP has demonstrated the ability to substantively contribute to the record on behalf of present and prospective customer generators.

(f) To the best of OREP's knowledge, no other party or pre-certified intervenor adequately represents the specific interests of customer generators in any solar photovoltaic incentive program. The pre-certified intervenors in this proceeding will be the Citizens Utility Board ("CUB") and perhaps the Industrial Customers of Northwest Utilities ("ICNU"). CUB represents the interests of residential ratepayers and ICNU represents only industrial customers. Thus, no other party or pre-certified intervenor represents the class of customer generators, present and prospective. All customers of PGE and PacifiCorp who support more distributed, local renewable energy would benefit from OREP's participation on their behalf in UM 1673.

(g) OREP's request for case certification will not unduly delay the schedule of UM 1673.

5. As demonstrated above, OREP meets the requirements of OAR 860-001-0120 (4) and Article 5.3 of the IFA. Therefore, OREP respectfully requests that the

Commission certify OREP as an entity eligible to receive Issue Fund Grants for UM
1673.

Dated this 9th day of December 2013.

Respectfully submitted,

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