BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 66

In the Matter of		PETITION TO INTERVENE OF
PORTLAND GENERAL ELECTRIC COMPANY,		RENEWABLE NORTHWEST
2016 Integrated Resource Plan.		
Renewable Northwest perfollowing is provided:	etitions to intervene i	in this proceeding. In support of this petition, the
1. The contact informati	on (name, address, e	email address) of the petitioner is:
Name: Company: Street Address: City, State, Zip: Email Address: Telephone:	Silvia Tanner Renewable Northwest 421 SW 6 th Avenue, Suite 1125 Portland, OR 97204 silvia@renewablenw.org 503-223-4544	
Please include this contact on the service list.		
<u> </u>	-	presented by counsel in this proceeding. The contact luded on the service list is listed under #1, above.
2b. Additional contacts to on the service list):	to be included on the	e service list (a petitioner is limited to three contacts
Name: Company: Street Address:	Renewable NW Do Renewable Northw 421 SW 6 th Avenue	vest

City, State, Zip: Portland, OR 97204

Email Address: dockets@renewablenw.org

Telephone: 503-223-4544

Name: Michael O'Brien Company: Renewable Northwest

Street Address: 421 SW 6th Avenue, Suite 1125

City, State, Zip: Portland, OR 97204

Email Address: michael@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 52 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:

Renewable Northwest is interested in ensuring that the utility resource planning process is properly designed and conducted so that it can accurately assess the contribution of renewable resources to the utility's system. Portland General Electric Company's Integrated Resource Plan ("IRP") could directly impact renewable development in the region. Renewable Northwest has members with an interest in renewable development in the region. Therefore, we have a direct and substantial interest in this proceeding. No other party can adequately represent Renewable Northwest'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 has a long-standing history of participating in regulatory proceedings and other stakeholder processes related utility resource planning, and brings significant experience and technical expertise. Additionally, Renewable Northwest has actively participated in workshops and technical discussions related to this IRP.

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 2nd day of November, 2016.

/s/ Silvia Tanner
Silvia Tanner, Staff Counsel
silvia@renewableNW.org

Exhibit A

Renewable Northwest Members (November 2016)

3Degrees

Absaroka Energy

American Wind Energy Association

Atkins

Avangrid Renewables

Bonneville Environmental Foundation

Center for Energy Efficiency & Renewable

Technologies

Citizens' Utility Board of Oregon

Climate Solutions

Columbia Gorge Community College

Community Renewable Energy Association

DNV GL

EDF Renewable Energy

EDP Renewables North America LLC

Environment Oregon

Environment Washington

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

Natural Resources Defense Council

NextEra Energy Resources

Northwest Environmental Business Council

Northwest SEED

NW Energy Coalition

OneEnergy Renewables

Oregon Solar Energy Industries Association

OSPIRG

Oregon Tech

Orion Renewable Energy Group LLC

Principle Power

REC Silicon

RES America Developments, Inc.

Solar Oregon

Stoel Rives, LLP

SunPower Corporation

SWCA Environmental Consultants

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates