BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 233

In the Matter of Petition to Intervene of Renewable Northwest Project and Waiver of Paper Service

Request for a General Rate Revision.

Pursuant to OAR 860-001-0300(2), Renewable Northwest Project ("RNP") petitions the Public Utility Commission ("Commission") to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information for RNP to be included on the service list is:

Megan Walseth Decker Renewable Northwest Project 421 SW 6th Avenue, Suite 1100 Portland, OR 97204 (503) 223-4544 megan@rnp.org

2. RNP will be represented in this proceeding by John W. Stephens of Esler, Stephens & Buckley. The contact information for RNP's counsel to be included on the service list is:

John W. Stephens, Esq.
Esler, Stephens & Buckley
888 SW Fifth Avenue, Suite 700
Portland, OR 97204-2021
stephens@eslerstephens.com; mec@eslerstephens.com

- 3. RNP is a non-profit advocacy organization with more than 50 members, including public interest groups and businesses. A list of RNP's members is attached as Exhibit A. RNP seeks to promote the expansion of environmentally responsible renewable energy resources across the Northwest region.
- 4. On July 29, 2011, Idaho Power Company ("Idaho Power") filed for an Oregon rate increase. On February 23, 2012, the Oregon Public Utility Commission (the "Commission") issued an order indicating that a second phase of the proceeding would be required to address certain coal plant pollution control investments regarding the Company's Jim Bridger Plant. On March 6, 2012, the Commission issued a prehearing

conference order opening Phase II of this docket. On April 19, 2012, PacifiCorp intervened in Phase II, arguing that it is directly affected by the Commission's decision regarding the prudence of the Bridger investments. On May 1, 2012, the Commission granted PacifiCorp's intervention over the objections of other parties in the case.

- 5. RNP has a substantial interest in PacifiCorp's participation in this docket, as the issues PacifiCorp has intervened to address in the Idaho Power proceeding will also be addressed in PacifiCorp's 2012 general rate case, Docket No. UE 246, in which RNP has intervened with full party status. Thus, RNP's interests in Phase II are essentially similar to those of PacifiCorp. RNP requests that the Commission grant RNP's participation in this proceeding, limited to briefing the legal issues.
- 6. RNP has extensive experience with regulatory proceedings involving integrated resource planning, renewable portfolio standard implementation, procurement of renewable resources, and other issues. RNP's counsel has been involved in many general rate cases.
- 7. RNP's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.
 - 8. RNP waives paper service of documents.

DATED this 9th day of May, 2012.

ESLER, STEPHENS & BUCKLEY, LLP

By: /s/ John W. Stephens
John W. Stephens, OSB No. 773583
Of Attorneys for Renewable Northwest
Project

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Exhibit A

Renewable Northwest Project Members (March 2012)

3Degrees

American Wind Energy Assoc.

Blattner Energy

Bonneville Environmental Foundation

BP Wind Energy

Calpine Corporation

Center for Energy Efficiency & Renewable

Technologies

CH2M Hill

Christenson Electric

Citizens' Utility Board

Climate Solutions

Clipper Windpower Development

Columbia Energy Partners

Columbia Gorge Community College

Community Renewable Energy Association

E.ON Climate & Renewables

EDP Renewables North America LLC

Element Power

Environment Oregon

Environment Washington

enXco, Inc.

Eurus Energy America

EverPower

First Wind

Gaelectric

Gamesa Energy USA

GE Energy

Geothermal Resources Council

GL Garrad Hassan

Green Mountain Energy Company

Iberdrola Renewables

Jones Stevedoring Company

Kapla Law PLLC

Lane Powell PC

MAP

Montana Environmental Information Center

MontPIRG

Natural Capital Partners

Natural Resources Defense Council

NaturEner

NextEra Energy Resources

Northwest Environmental Business Council

NW Energy Coalition

Oregon Solar Energy Industries Association

OSPIRG

Port of Vancouver, USA

Portland Energy Conservation, Inc.

REC Silicon

RES America Developments, Inc.

Ridgeline Energy

Solar Oregon

SolarCity

Stoel Rives, LLP

SunPower Corporation

Suzlon Wind Energy Corporation

SWCA Environmental Consultants

Tanner Creek Energy

Tonkon Torp LLP

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT AND WAIVER OF PAPER SERVICE** on the following persons on May 9, 2012, by e-mailing to each a copy thereof:

Don Reading		by hand-delivery
dreading@mindspring.com		by facsimile
6070 Hill Road		by first class mail
Boise, Idaho 83703	\bowtie	by e-mail
Joshua D. Johnson, Esq.		by hand-delivery
jdj@racinelaw.net		by facsimile
101 S. Capitol Boulevard, Suite 300		by first class mail
Boise, Idaho 83702	\boxtimes	by e-mail
Eric L. Olsen, Est.		by hand-delivery
elo@racinelaw.net		by facsimile
201 E. Center Street		by first class mail
Pocatello, Idaho 83201	\bowtie	by e-mail
Gordon Feighner		by hand-delivery
gordon@oregoncub.org		by facsimile
Utility Analyst		by first class mail
Citizen's Utility Board of Oregon	\boxtimes	by e-mail
610 S.W. Broadway, Suite 400		
Portland, Oregon 97205		
Bob Jenks		by hand-delivery
bob@oregoncub.org		by facsimile
Executive Director		by first class mail
Citizens' Utility Board of Oregon	\boxtimes	by e-mail
610 S.W. Broadway, Suite 308		
Portland, Oregon 97205		
G. Catriona McCracken, Esq.		by hand-delivery
catriona@oregoncub.org		by facsimile
Staff Attorney		by first class mail
Citizen's Utility Board of Oregon	\boxtimes	by e-mail
610 S.W. Broadway, Suite 400		
Portland, Oregon 97205		
Irion A. Sanger, Esq.		by hand-delivery
mail@dvclaw.com		by facsimile
Davison Van Cleve		by first class mail
333 S.W. Taylor, Suite 400	\bowtie	by e-mail
Portland, Oregon 97204		

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ESLER, STEPHENS & BUCKLEY, LLP

Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Melinda J. Davison mjd@dvclaw.com Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204	by hand-delivery by facsimile by first class mail by e-mail
Christa Bearry cbearry@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070	by hand-delivery by facsimile by first class mail by e-mail
Lisa D. Nordstrom, Esq. Inordstrom@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070	by hand-delivery by facsimile by first class mail by e-mail
Lisa F. Rackner dockets@mcd-law.com McDowell Rackner & Gibson, P.C. 419 S.W. 11 th Avenue, Suite 400 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by e-mail
R. Bryce Dalley bryce.dalley@pacificorp.com Pacific Power 825 N.E. Multnomah Street, Suite 2000 Portland, Oregon 97232	by hand-delivery by facsimile by first class mail by e-mail
Sarah Wallace Sarah.wallace@pacificorp.com Pacific Power 825 N.E. Multnomah Street, Suite 1800 Portland, Oregon 97232	by hand-delivery by facsimile by first class mail by e-mail
PacifiCorp Oregon Dockets oregondockets@pacificorp.com 825 N.E. Multnomah, Suite 2000 Portland, Oregon 97232	by hand-delivery by facsimile by first class mail by e-mail
Randall Dahlgren randy.dahlgren.@pgn.com Portland General Electric Company 121 S.W. Salmon Street, 1WTC 0702	by hand-delivery by facsimile by first class mail by e-mail

Portland, Oregon 97204

Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Douglas C. Tingey, Esq. doug.tingey@pgn.com Assistant General Counsel Portland General Electric Company 121 S.W. Salmon Street, 1WTC1301 Portland, Oregon 97204	by hand-delivery by facsimile by first class mail by e-mail
Erik Colville erik.colville@state.or.us Public Utility Commission PO Box 2148 Salem, Oregon 97308-2148	by hand-delivery by facsimile by first class mail by e-mail
Judy Johnson Judy.johnson@state.or.us Public Utility Commission P.O. Box 2148 Salem, Oregon 97308-2148	by hand-delivery by facsimile by first class mail by e-mail
Stephanie S. Andrus stephanie.andrus@state.or.us Department of Justice 1162 Court Street N.E. Salem, Oregon 97301-4096	by hand-delivery by facsimile by first class mail by e-mail
Donald W. Schoenbeck dws@r-c-s-inc.com Regulatory & Cogeneration Services, Inc. 900 Washington Street, Suite 780 Vancouver, Washington 98660-3455	by hand-delivery by facsimile by first class mail by e-mail
Gregory M. Adams, Esq. Greg@richardsonandoleary.com Richardson & O'Leary 515 N. 27th Street P.O. Box 7218 Boise, Idaho 83702	by hand-delivery by facsimile by first class mail by e-mail
Peter J. Richardson oeter@richardsonandoleary.com Richardson & O'Leary 515 N. 27th Street P.O. Box 7218	by hand-delivery by facsimile by first class mail by e-mail

Boise, Idaho 83702

Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Anthony J. Yankel tony@yankel.net Utility Net, Inc. 29814 Lake Road	by hand-delivery by facsimile by first class mail by e-mail
Bay Village, Ohio 44140 Megan Walseth Decker megan@rnp.org Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205	 □ by hand-delivery □ by facsimile □ by first class mail □ by e-mail
DATED this 9 th day of May, 2012.	ESLER, STEPHENS & BUCKLEY, LLP
	By: /s/ John W. Stephens John W. Stephens, OSB No. 773583

stephens@eslerstephens.com
Of Attorneys for Renewable Northwest Project