

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1396

Renewable Energy Coalition)	PETITION TO INTERVENE
)	OUT OF TIME

Pursuant to OAR 860-011-0000(6), the Petitioner Renewable Energy Coalition hereby petitions for leave to intervene in the above-captioned proceeding out of time. Petitioner submits in support of this petition that it was not in existence when this docket was opened in October 2008 and that the filing of Administrative Law Judge's ruling on September 29, 2009, reopening the docket for further comment made Petitioner's participation possible.

NAME OF PETITIONER: Renewable Energy Coalition

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E-MAIL ADDRESSES: jravenesanmarcos@yahoo.com; renerco@thnelson.com

NAME OF COUNSEL FOR PETITIONER: Thomas H. Nelson

COUNSEL'S ADDRESS: PO Box 1211

COUNSEL'S PHONE NUMBER: 503.622.3123

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COUNSEL'S E-MAIL ADDRESS: nelson@thnelson.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

At the present there are approximately five members, each of which is an irrigation district that has or hopes to have power-purchase agreements with PacifiCorp. The purpose of the organization is to assist such districts and any other entities so interested in achieving fair and just terms and conditions in such power-purchase agreements.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner requests full party status in order to address all aspects of the investigation in to PacifiCorp's recent avoided-cost filing.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

Appropriate methods and methodologies for determining resource sufficiency and the impact of such determination(s).

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

Representatives of Petitioner have been involved in regulatory matters in general, and avoided-cost matters in Oregon in particular, since the passage of the Public Utility Regulatory Policies Act of 1978, both on behalf of investor-owned utilities and on behalf of cogenerators and small power producers.

Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Energy Coalition requests to participate in this proceeding as an intervenor. Renewable Energy Coalition will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001.

The undersigned hereby consents to receipt of all materials related to this docket by electronic transmission to the email address specified above.

DATED at Welches, Oregon, 8th day of October, 2009.



Thomas H. Nelson, OSB 78315
Petitioner's Representative
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Welches, OR 97067-1211
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CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing RENEWABLE ENERGY COALITION'S PETITION TO INTERVENE on all parties of record as set forth on the Commission's website by electronic filing. I further certify that I have served the foregoing by U.S. Mail on the following entities which have not waived paper service:

Staff
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

ICNU, c/o Irion Sanger
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