BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1535

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY,

Request for Proposals for Capacity Resources

Petition to Intervene of Renewable Northwest Project and Waiver of Paper Service

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 917 SW Oak Street, Suite 303 Portland, OR 97205 (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 requests that electronic service of documents also be made on:

Jimmy Lindsay Renewable Northwest Project 917 SW Oak Street, Suite 303 Portland, OR 97205 (503) 223-4544 jimmy@rnp.org

- 4. 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 resources across the Northwest region.
- 6. RNP has a substantial interest in PGE's resource selection. RNP seeks to promote the efficient integration of environmentally responsible renewable resources across the Northwest region. RNP's interest in this proceeding will not be represented by any other party.
- 7. 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.
- 8. 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.
 - 9. RNP waives paper service of documents.

DATED this 10th day of May, 2011.

ESLER, STEPHENS & BUCKLEY, LLP

By:

John W. Stephens

Of Attorneys for Renewable Northwest

Project

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Exhibit A

Renewable Northwest Project Members (5/9/11)

3Degrees

American Wind Energy Assoc.

Blattner Energy

Bonneville Environmental Foundation

BP Wind Energy

Calpine

Center for Energy Efficiency & Renewable

Technologies

CH2M Hill

Citizens' Utility Board

Climate Solutions

Clipper Windpower

Columbia Energy Partners

Columbia Gorge Community College

David Evans & Associates

E.ON Climate & Renewables

Element Power

Environment Oregon

Environment Washington

enXco, Inc.

Eurus Energy America

EverPower

Gaelectric

Gamesa Energy USA

GE Energy

Geothermal Resources Council

GL Garrad Hassan

Green Mountain Energy

Horizon Wind Energy

Iberdrola Renewables

Jones Stevedoring

Lane Powell PC

MAP

Montana Environmental Information Center

MontPIRG

Natural Resources Defense Council

NaturEner

NextEra Energy Resources

Northwest Environmental Business Council

Northwest Environmental Advocates

NW Energy Coalition

OSPIRG

Port of Vancouver, USA

Portland Energy Conservation, Inc.

REC Silicon

RES America Developments

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

Western Wind Power

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 10, 2011:

Janet L. Prewitt janet.prewitt@doj.state.or.us Assistant Attorney General Department of Energy Natural Resources Section 1162 Court Street N.E. Salem, Oregon 97301-4096	by hand-delivery by facsimile by first class mail by e-mail
Matt Krumenauer matt.krumenauer@state.or.us Oregon Department of Energy 625 Marion Street N.E. Salem, Oregon 97301	by hand-delivery by facsimile by first class mail by e-mail
Vijay A. Satyal vijay.a.satyal@state.or.us Senior Policy Analyst Oregon Dept. of Energy 625 Marion Street N.E. Salem, Oregon 97301	by hand-delivery by facsimile by first class mail by e-mail
Gordon Feighner gordon@oregoncub.org Utility Analyst Citizens' Utility Board of Oregon 610 S.W. Broadway, Suite 400 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by e-mail
Bob Jenks bob@oregoncub.org Executive Director Citizens' Utility Board of Oregon 610 S.W. Broadway, Suite 400 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by e-mail
G. Catriona McCracken, Esq. catriona@oregoncub.org Staff Attorney Citizens' Utility Board of Oregon 610 S.W. Broadway, Suite 400 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by e-mail

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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 10th day of May, 2011.

CERTIFICATE OF SERVICE

ESLER STEPHENS & BUCKLEY

John W. Stephens, OSB No. 773583 stephens@eslerstephens.com Of Attorneys for Renewable Northwest Project

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