

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1719

In the Matter of)	
)	RENEWABLE ENERGY COALITION
PUBLIC UTILITY COMMISSION OF)	PETITION TO INTERVENE
OREGON)	
)	
Investigation to Explore Issues Related to a)	
Renewable Generator’s Contribution to)	
Capacity)	
_____)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“REC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, REC provides the following information:

The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

REC will be represented in this proceeding by Sanger Law, PC. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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REC was established in 2009, and is comprised of over thirty members that are small qualifying facilities (“QFs”) who own and operate nearly forty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts.

The Commission’s investigation into issues related to renewable energy generators’ capacity value could have a direct and substantial impact on REC’s members. The Commission intends for the investigation to establish the renewable resource capacity contribution that can be used to set avoided cost rates and integrated resource planning. REC’s members have power purchase agreements (“PPAs”) with Oregon investor owned electric utilities with rates based on the utilities’ avoided costs. Most of REC’s members are existing projects that have operating and selling to Oregon utilities for numerous years. In addition, REC’s members purchase back up, station service, and other electrical needs from Oregon utilities. Therefore, this proceeding could impact the avoided cost rates paid to, and electric power rates paid by, REC’s members. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and the Public Utility Regulatory Policies Act (“PURPA”) throughout the Northwest and Oregon. REC’s attorney has participated in numerous Commission proceedings and investigations regarding Oregon’s investor owned electric utilities. REC’s intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, REC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 26th day of March, 2015.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned above the typed name and contact information.

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Of Attorneys for the Renewable Energy Coalition