

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1773

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Petition for Partial Waiver of Competitive  
Bidding Guidelines and Approval of  
Request for Proposals (RFP) Schedule

PETITION TO INTERVENE OF  
RENEWABLE NORTHWEST

Renewable Northwest petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Dina Dubson Kelley  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: dina@renewableNW.org  
Telephone: 503-223-4544

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is listed under #1, above.

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Renewable NW Dockets  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: dockets@renewableNW.org  
Telephone: 503-223-4544

Name: Silvia Tanner  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: silvia@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 51 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:

In pursuit of its mission to advocate for the expansion of renewable energy resources in the region, Renewable Northwest actively participates in proceedings and discussions related to utility Renewable Portfolio Standard ("RPS") compliance strategies and utility plans to procure renewable energy resources. Renewable Northwest also participated in the proceedings that led to the existing competitive bidding guidelines. In addition, several members of Renewable Northwest are developers of renewable resources that may submit proposals in response to Portland General Electric's ("PGE") Request for Proposals ("RFP"). Renewable Northwest's perspective on the issues raised thus far in this proceeding differs from that of other parties. Accordingly, 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. Because Renewable Northwest's members may bid into PGE's RFP, Renewable Northwest does not intend to sign the Protective Order in this proceeding, nor does it intend to seek any confidential information. If there are discussions among the parties involving confidential information, Renewable Northwest is willing to leave the room and not participate in any part of the discussions pertaining to such confidential information.

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 history of participating in discussions and regulatory proceedings related to utility RPS compliance strategies, integrated resource planning, and renewable resource procurement plans. Additionally, Renewable Northwest was part of the proceeding that led to the existing competitive guidelines, and was one of the principal proponents of SB 1547. Commission Order 16-221 directed PGE and other stakeholders to engage in timely dialogue with respect to any issues or concerns regarding the proposed RFP. Renewable Northwest has engaged in such dialogue with PGE and other stakeholders, and wishes to formalize its participation in the process.

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 30<sup>th</sup> day of June, 2016.

*/s/ Dina Dubson Kelley* \_\_\_\_\_

Dina Dubson Kelley  
Chief Counsel  
Renewable Northwest  
421 SW Sixth Ave, Suite 1125  
Portland, OR 97204  
(503) 223-4544  
[dina@renewableNW.org](mailto:dina@renewableNW.org)

**Exhibit A**  
Renewable Northwest Members (June 2016)

3Degrees	RES America Developments, Inc.
Absaroka Energy	Solar Oregon
American Wind Energy Association	Stoel Rives, LLP
Atkins	SunPower Corporation
Avangrid Renewables	SWCA Environmental Consultants
Bonneville Environmental Foundation	Vestas Americas
Center for Energy Efficiency & Renewable Technologies	Warm Springs Power & Water Enterprises
Citizens' Utility Board of Oregon	Washington Environmental Council
Climate Solutions	WashPIRG
Columbia Gorge Community College	Western Resource Advocates
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	
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	