BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1776

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	
OREGON,)	RENEWABLE ENERGY COALITION'S
)	PETITION TO INTERVENE
Investigation of Competitive Bidding)	
Guidelines Related to Senate Bill 1547)	
)	
)	

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

Sanger Law, PC will represent REC in this proceeding. All documents relating to these proceedings should be served on the following persons:

Sidney Villanueva
Sanger Law, PC
Renewable Energy Coalition
1117 SE 53rd Avenue
Portland, OR 97215
Portland, OR 97225
Telephone: 503-747-3658
Telephone: 503-372-6909

Fax: 503-334-2235 Fax: 503-372-6908

sidney@sanger-law.com jravenesanmarcos@yahoo.com

REC was established in 2009, and is comprised of thirty-four members who own and operate over fifty small qualifying facilities ("QFs") throughout the Northwest. Several types of entities are members of REC, including irrigation districts, cooperatives, water districts, corporations, and individuals. Most REC members are under 10 MW in size and sell energy to investor-owned utilities. REC primary focus is on small scale renewable energy policy that could impact future opportunities for its members to sell energy to state-regulated utilities.

The Commission has been directed by Senate Bill 1547 to ensure the competitive bidding guidelines allow for diverse ownership of renewable energy sources that generate QF energy. Because REC's members generate QF energy, they have an interest in ensuring that any changes to the Commission's competitive guidelines enhance rather than hinder the ability of non-utility owners to to sell power in Oregon. No other party can adequately represent REC's interest in this proceeding.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and Oregon. 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 8th day of September 2016.

Respectfully submitted,

Sidney Villanueva Sanger Law, PC

1117 SE 53rd Avenue Portland, OR 97215

Telephone: 503-747-3658

Fax: 503-334-2235

sidney@sanger-law.com

Of Attorneys for the Renewable Energy Coalition