

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1788

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC,)	RENEWABLE ENERGY COALITION'S
)	PETITION TO INTERVENE
2016 Revised Renewable Portfolio Standard)	
Implementation Plan)	
_____)	

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:

Irion A. Sanger Sanger Law, PC 1117 SE 53rd Avenue Portland, OR 97215 Telephone: 503-756-7533 Fax: 503-334-2235 irion@sanger-law.com	John Lowe Renewable Energy Coalition 12050 SW Tremont Street Portland, OR 97225 Telephone: 503-372-6909 Fax: 503-372-6908 jravenesanmarcos@yahoo.com
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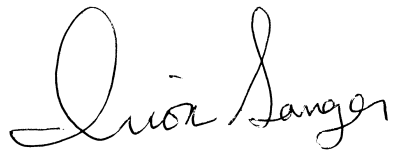
REC was established in 2009, and is comprised of thirty-four members who own and operate over fifty small qualifying facilities (“QFs”) throughout the Northwest. Several types of entities are members of REC, including irrigation districts, water districts, cooperatives, corporations, and individuals. REC’s members sell electricity generated from hydroelectricity, biomass, geothermal, and waste. This case represents a road map for implementation of PGE’s plan to purchase renewable power, and could directly and substantially impact the ability of QFs to sell power into the market.

REC has participated in numerous regulatory proceedings related to renewable energy, QFs, PPAs, avoided costs, integrated resource planning, and the Public Utility Regulatory Policies Act 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 2nd day of September 2016.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Irion Sanger". The signature is fluid and cursive, with a large initial "I" and a long, sweeping tail.

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Of Attorneys for the Renewable Energy Coalition