

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1793

In the Matter of

IDAHO POWER COMPANY,

Application for Approval of Solar
Integration Charge.

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 6th Ave, 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 6th 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 6th 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:

Renewable Northwest is interested in ensuring that renewable avoided cost rates send accurate market signals to parties looking to develop QFs in Oregon. Renewable Northwest is also interested in ensuring that the methodologies and costs associated with integrating renewable energy resources are accurate. Idaho Power's solar integration charges could directly impact renewable QF development in the company's territory. Renewable Northwest has QF developer members who are active in Oregon. Therefore, we have a direct and substantial interest in this proceeding. 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.

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 regulatory proceedings and other stakeholder processes related to the development and integration of renewable energy projects, including those associated with renewable QFs under PURPA. Of particular relevance to this proceeding, Renewable Northwest staff served on the Technical Review Committee for Idaho Power's Solar Integration Study that formed the basis for the proposed rates. In addition, Renewable Northwest participated in the proceeding before the Idaho Public Utilities Commission regarding the Solar Integration Study and associated rates.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Northwest respectfully requests that the Commission grants 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 8th day of September, 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

Exhibit A
Renewable Northwest Members (September 2016)

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