## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 1794

In the Matter of	)
PACIFICORP, dba PACIFIC POWER,	)
Investigation into Schedule 37 – Avoided Cost Purchases from Qualifying Facilities of 10,000 kW or Less	) )

## RENEWABLE ENERGY COALITION'S PETITION TO INTERVENE

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 Sidney Villanueva Sanger Law, PC 1117 SE 53rd Avenue Portland, OR 97215 Telephone: 503-747-3658 Fax: 503-334-2235 sidney@sanger-law.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. This proceeding will set the avoided cost rates for QFs, including REC's members, and could directly and substantially impact their ability to operate.

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 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,

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Of Attorneys for the Renewable Energy Coalition