

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1799

CYPRESS CREEK RENEWABLES, LLC

Complainant,

Vs.

PACIFICORP dba PACIFIC POWER,

Defendant.

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: 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

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: Dina Dubson Kelley
Company: Renewable Northwest
Street Address: 421 SW 6th Avenue, Suite 1125
City, State, Zip: Portland, OR 97204
Email Address: dina@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 52 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 Qualifying Facilities ("QFs") in Oregon. PacifiCorp's position that the Oregon Public Utility Commission's rules and orders do not obligate it to offer a renewable avoided cost stream to renewable QFs above the eligibility threshold for standard rates will 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 related to the development and integration of renewable energy projects, including renewable QFs under PURPA. Of particular relevance to this proceeding, Renewable Northwest is a party to UM 1610. PacifiCorp bases its position on its interpretation of Phase II of that proceeding.

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 7th day of November, 2016.

/s/ Silvia Tanner

Silvia Tanner, Staff Counsel

silvia@renewableNW.org

Exhibit A
Renewable Northwest Members (November 2016)

3Degrees	REC Silicon
Absaroka Energy	RES America Developments, Inc.
American Wind Energy Association	Solar Oregon
Atkins	Stoel Rives, LLP
Avangrid Renewables	SunPower Corporation
Bonneville Environmental Foundation	SWCA Environmental Consultants
Center for Energy Efficiency & Renewable Technologies	Vestas Americas
Citizens' Utility Board of Oregon	Warm Springs Power & Water Enterprises
Climate Solutions	Washington Environmental Council
Columbia Gorge Community College	WashPIRG
Community Renewable Energy Association	Western Resource Advocates
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	
Latitude45 Associates	
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	