



**Portland General Electric Company**  
*Legal Department*  
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**V. Denise Saunders**  
*Associate General Counsel*

October 31, 2016

***Via Electronic Filing and U.S. Mail***  
Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 1088  
Salem OR 97308-1088

**Re: UM 1799 – Cypress Creek Renewables, LLC against PacifiCorp dba Pacific Power**

Attention Filing Center:

Please find enclosed the Petition to Intervene of Portland General Electric Company in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive, flowing style.

**V. DENISE SAUNDERS**  
Associate General Counsel

VDS:lgh  
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1799**

CYPRESS CREEK RENEWABLES,  
LLC

Complainant,

Vs.

PACIFICORP D/B/A PACIFIC POWER,

Defendant.

PORTLAND GENERAL ELECTRIC  
COMPANY'S PETITION TO  
INTERVENE

Portland General Electric Company ("PGE" or the "Company") petitions to intervene in this proceeding pursuant to ORS 756.525 and OAR 860-001-0300. In support of this petition, PGE provides the following.

- a) The name and address of the Company is:

Portland General Electric Company  
121 SW Salmon Street  
Portland, Oregon 97204

- b) The names and addresses of the persons to be included on the official service list

in this proceeding are:

V. Denise Saunders  
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- c) PGE is a public utility subject to the jurisdiction of the Commission.

d) This proceeding involves a complaint by Cypress Creek Renewables, LLC raising issues concerning the appropriate avoided costs to be paid by renewable qualifying facilities (QFs).

e) PGE has a direct and substantial interest in these proceedings as PGE enters into contracts with renewable QFs. Therefore, decisions made and precedent established in this proceeding may directly affect PGE.

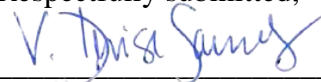
f) No other party could adequately represent the interests of PGE.

g) PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Accordingly, PGE's petition to intervene should be granted.

DATED this 31st day of October, 2016.

Respectfully submitted,



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