

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1799

In the Matter of)	
)	
CYPRESS CREEK RENEWABLES, LLC,)	
)	RENEWABLE ENERGY COALITION’S
vs.)	PETITION TO INTERVENE
)	
PACIFICORP dba PACIFIC POWER,)	
)	
<u>Pursuant to ORS 756.500.</u>)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“the Coalition”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, the Coalition provides the following information:

The name and address of the Coalition is:

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent the Coalition 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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The Coalition was established in 2009, and is comprised of thirty-four members who own and operate over fifty qualifying facilities (“QFs”) throughout the Northwest. The Coalition’s focus is on renewable energy policy that could impact future opportunities for its members to sell energy to state-regulated utilities. Several types of entities are members of the Coalition, including irrigation districts, cooperatives, water districts, corporations, and individuals. Although most Coalition members have small projects, at least one member has a 30 MW biomass project that will be directly affected by the outcome of this declaratory ruling.

The Commission’s policy distinguishing between standard and renewable avoided cost rates for renewable QFs has been established through a series of Commission orders. PacifiCorp has recently interpreted this policy in a way that limits renewable QFs above the standard contract size to only standard avoided cost pricing. The Coalition’s members are above and below the standard contract size and generate renewable QF energy, and the Commission’s clarification on this issue could substantially impact the ability of Coalition members to sell power into the market. Coalition members above the standard contract size will be directly impacted by the Commission’s clarification. Coalition members below the standard contract size may also be impacted if, for example, the size threshold for standard pricing is adjusted. No other party can adequately represent the Coalition’s interest in this proceeding.

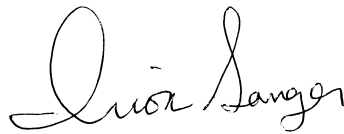
The Coalition has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and Oregon. The Coalition’s attorney has participated in numerous Commission proceedings and investigations regarding Oregon’s investor owned electric utilities. The

Coalition'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, the Coalition 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 4th day of November 2016.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

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Of Attorneys for the Renewable Energy Coalition