

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1802

In the Matter of

**PUBLIC UTILITY COMMISSION OF
OREGON,**

**Investigation to Examine PacifiCorp, dba Pacific
Power's Non-Standard Avoided Cost Pricing**

**Petition to Intervene of
Cypress Creek Renewables, LLC**

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Cypress Creek Renewables, LLC (“Cypress Creek”) petitions the Public Utility Commission of Oregon (the “Commission”) to intervene and appear in Docket UM 1802 with full party status. In support of this petition to intervene, Cypress Creek provides the information below.

The name and address of Cypress Creek is:

Cypress Creek Renewables, LLC
3250 Ocean Park Blvd
Suite 355
Santa Monica, CA 90405

Wilson Sonsini Goodrich & Rosati PC will represent Cypress Creek in these proceedings. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Cypress Creek Renewables, LLC
3250 Ocean Park Blvd
Suite 355
Santa Monica, CA 90405
Attention: David Bunge
Phone: (636) 474-9067
Email: bunge@ccrenew.com

Wilson Sonsini Goodrich & Rosati PC
701 Fifth Avenue
Suite 5100
Seattle, WA 98104
Attention: Todd G. Glass
Keene M. O'Connor
Phone: (206) 883-2500
Email: tglass@wsgr.com
kmoconnor@wsgr.com

Cypress Creek is a developer of solar QFs throughout the United States, including in Oregon. Cypress Creek petitioned the Commission to issue a declaratory ruling confirming the Commission’s determination and directive in Order No. 11-505 that “[r]enewable QFs willing to sell their output and cede their RECs to the utility allow the utility to avoid building (or buying) renewable generation to meet their RPS requirements [and these] QFs should be offered an avoided cost stream that reflects the costs that utility will avoid.” Docket No. UM 1396 (Phase II), Order No. 11-505 at 9 (Dec. 13, 2011) (“Order No. 11-505”). In Order No. 16-378, the Commission chose to treat Cypress Creek’s petition as a complaint (the “Complaint”), which is now pending before the Commission in Docket No. UM 1799.

The matters now at issue in this docket are intimately linked with the issues raised in Docket No. UM 1799. The resolution of these and any related issues in this docket could have profound impacts not only on Cypress Creek’s legal position in Docket No. UM 1799 but indeed on Cypress Creek’s current and future development efforts in Oregon, including in respect of the non-standard qualifying facility projects that Cypress Creek hopes to develop in this state.

No other party can adequately represent Cypress Creek’s interest in this proceeding. Cypress Creek’s intervention will assist the Commission in resolving the issues currently before it. Cypress Creek will not unreasonably broaden the issues, burden the record or delay this proceeding.

//

//

//

//

WHEREFORE, Cypress Creek 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, to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Respectfully submitted this 28th day of November, 2016.

/s/ Todd G. Glass
Todd G. Glass, OSB 943193
Keene M. O'Connor
Wilson Sonsini Goodrich & Rosati PC
701 5th Avenue
Suite 5100
Seattle, WA 98104
Phone: (206) 883-2500
Fax: (206) 883-2599
tglass@wsgr.com
kmoconnor@wsgr.com

*Of Attorneys for
Cypress Creek Renewables, LLC*