## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1805

NORTHWEST AND INTERMOUNTAIN
POWER PRODUCERS COALITION;
COMMUNITY RENEWABLE ENERGY
ASSOCIATION; and RENEWABLE
ENERGY COALITION,
Complainants,

PETITION TO INTERVENE OF RENEWABLE NORTHWEST

V.

PORTLAND GENERAL ELECTRIC COMPANY, Defendant.

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 6<sup>th</sup> 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  $\boxtimes$  will  $\square$  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 6<sup>th</sup> 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 6<sup>th</sup> 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.

X 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 avoided cost rates send accurate market signals to parties looking to develop Qualifying Facilities ("QFs") in Oregon. The actual availability of fixed pricing to QFs seeking standard QF contracts with Portland General Electric Company will directly impact QF development in the state. 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, we have been actively engaged in discussions and regulatory proceedings regarding the fixed-price term of standard QF contracts.

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 21st day of December, 2016.

/s/ Silvia Tanner
Silvia Tanner, Staff Counsel
silvia@renewableNW.org

## Exhibit A

## Renewable Northwest Members (November 2016)

3Degrees

Absaroka Energy

American Wind Energy Association

Atkins

Avangrid Renewables

Bonneville Environmental Foundation

Center for Energy Efficiency & Renewable

Technologies

Citizens' Utility Board of Oregon

Climate Solutions

Columbia Gorge Community College

Community Renewable Energy Association

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

REC Silicon

RES America Developments, Inc.

Solar Oregon

Stoel Rives, LLP

SunPower Corporation

**SWCA** Environmental Consultants

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates