BEFORE THE

PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ELECTIC COMPANY, 2018 Request for Proposals for Renewable Resources) CASE NO. UM 1934
	PETITION TO INTERVENE OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION
	,

Pursuant to ORS 756.525 and OAR 860-001-0300, the Community Renewable Energy Association ("CREA") hereby respectfully petitions the Public Utility Commission of Oregon ("OPUC" or "Commission") to grant CREA intervenor status in this proceeding. In support of this Petition, CREA states as follows:

1. The name and address of CREA is:

> Community Renewable Energy Association c/o Brian Skeahan 515 E 2nd Street The Dalles, OR 97508 Email: Brian.skeahan@yahoo.com

- 2. CREA will be represented in this proceeding by Peter J. Richardson (OSB No. 066687) and Gregory M. Adams (OSB No. 101779), of the law firm Richardson Adams, PLLC.
- 3. All documents relating to this proceeding should be served on the following persons:

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- 4. CREA is an Oregon Rev. Stat. Ch. 190 intergovernmental association. *See* ORS 190.003- 190.118. CREA consists of local governments seeking to promote locally-owned renewable energy projects for all forms of renewable generation recognized in Oregon's Renewable Portfolio Standard (biomass, geothermal, hydropower, ocean thermal, solar, tidal, wave, wind and hydrogen). CREA is comprised of several Oregon counties which provide active participation through their county commissioners, including Sherman, Wasco, Gilliam, Harney, Hood River, Morrow, Polk, Union, Wheeler, Curry, and Wallowa. In addition to these counties, CREA's current membership includes the Mid-Columbia Council of Governments, Columbia Gorge Community College, and 25 irrigation districts, businesses, individuals and non-profit organizations who have interest in a viable community renewable energy sector for Oregon.
- 5. In its efforts to establish a viable market in Oregon for community-scale renewable energy projects, CREA has intervened or otherwise actively participated in dockets at the Commission regarding the implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978 ("PURPA") and dockets related to competitive bidding for renewable resources.
- 6. CREA's members and representatives possess information and knowledge that would be of assistance to the Commission in this proceeding.
- 7. CREA's participation in this docket will assist the Commission in resolving the issues and will not unreasonably burden the record, delay the proceedings or broaden the issues.
- 8. Because no other party can adequately represent CREA's interests in this proceeding, CREA respectfully requests that the Commission grant this Petition to Intervene.

Dated: March 29, 2018.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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Of Attorneys for the Community Renewable

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