## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

## **UM 1934**

In t	he	Matt	er	of

PORTLAND GENERAL ELECTRIC,

2018 Request for Proposals for Renewable Resources.

PETITION TO INTERVENE OF RENEWABLE NORTHWEST

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 975

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 Northwest Dockets

Company: Renewable Northwest

Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 975

City, State, Zip: Portland, OR 97204

Email Address: dockets@renewablenw.org

Telephone: 503-223-4544

Name: Michael H. O'Brien Company: Renewable Northwest

Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 975

City, State, Zip: Portland, OR 97204

Email Address: michael@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 58 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.

☐ List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

In pursuit of our mission to advocate for the expansion of cost-effective and environmentally responsible renewable energy in the Northwest, we actively participate in proceedings and discussions related to utility resource planning and procurement processes. Renewable Northwest was a stakeholder throughout the formal and informal portions of Portland General Electric's ("PGE's") 2016 Integrated Resource Plan ("IRP") that resulted in the draft request for proposals at issue in this docket ("RFP"). Additionally, several members of Renewable Northwest are developers of renewable resources that may submit proposals in response to PGE's 2018 RFP. Accordingly, 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 discussions and regulatory proceedings related to utility resource planning and procurement. Of particular relevance to this proceeding, we participated in LC 66 and in the informal process leading to PGE's 2016 IRP.

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. Allowing Renewable Northwest to intervene in this proceeding is in the public interest. Moreover, our 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 12<sup>th</sup> day of March, 2018.

/s/ Silvia Tanner
Silvia Tanner
Senior Counsel & Analyst
silvia@renewableNW.org

## Exhibit A

## Renewable Northwest Members (March 2018)

3Degrees

7Skyline, LLC

174 Power Global

American Wind Energy Association

Avangrid Renewables

Bonneville Environmental Foundation

Center for Energy Efficiency & Renewable

Technologies

Climate Solutions

Columbia Gorge Community College

Community Renewable Energy Association

Cypress Creek Renewables

Davis Wright Tremaine LLP

DNV GL

**EDF** Renewable Energy

EDP Renewables North America LLC

**Environment Oregon** 

**Environment Washington** 

Erwin Legal

Eurus Energy America

EverPower

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

National Grid

Natural Resources Defense Council

NextEra Energy Resources

Northwest Environmental Business Council

NRG Energy, Inc.

**NW Energy Coalition** 

OneEnergy Renewables

Oregon Citizens' Utility Board

Oregon Solar Energy Industries Association

**OSPIRG** 

Oregon Tech

Orion Renewable Energy Group LLC

Pattern Energy

Scout Clean Energy

Sempra Renewables

Solar Oregon

Spark Northwest

Stoel Rives, LLP

Sulus Solar

SunPower Corporation

**SWCA** Environmental Consultants

Tetra Tech

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates