

Peter J. Richardson
OSB No. 06668
Richardson & O'Leary
515 N. 27th Street
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901 Tel
Fax: (208) 938-7904 Fax
peter@richardsonandoleary.com

Attorneys for Community Renewable Energy Association


BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER THE PUBLIC UTILITY COMMISSION OF OREGON)	CASE NO. UM-1396
Investigation into Determination of Resource Sufficiency, pursuant to Order No. 06-538)	OPENING BRIEF OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION

Pursuant to that Prehearing Conference Order dated June 15, 2009, the Community Renewable Energy Association (“CREA”) hereby submits its Opening Brief in the above captioned matter.

CREA has reviewed the Opening Brief being filed today by the Industrial Customers of Northwest Utilities (“ICNU”) and believes it is important for the Commission to understand that CREA endorses ICNU’s position. CREA promotes the development of community renewable energy projects and is therefore impacted by the unwarranted reduction in avoided cost rates that result from the use of the current artificial and inaccurate resource sufficiency methodology by Oregon’s investor-owned utilities.

ICNU's arguments and statements in its Opening Brief are hereby endorsed and adopted
by CREA.

By 
Peter J. Richardson
RICHARDSON & O'LEARY, PLLC
Attorneys for Community Renewable
Energy Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of July, 2009, a true and correct copy of the within and foregoing **OPENING BRIEF OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION** was served via U.S. Postal service to all parties who have not waived paper service.



Nina M. Curtis

Docket No: UM 1396

Docket Name: INVESTIGATION INTO DETERMINATION OF RESOURCE SUFFICIENCY

[Print Summary](#)

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation into determination of resource sufficiency, pursuant to Order No. 06-538. Filed by Ed Durrenberger. (See Docket No. UM 1129 for electronic version of Order No. 06-538.)

Filing Date: 10/23/2008

Case Manager: ED DURRENBERGER

Phone: (503) 373-1536

Email: ed.durrenberger@state.or.us

Law Judge: PATRICK POWER

Phone:

W=Waive Paper service	C=Confidential HC=Highly Confidential	Sort by Last Name	Sort by Company Name
W	*DEPARTMENT OF JUSTICE JANET L PREWITT ASSISTANT AG		NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us
W	*OREGON DEPARTMENT OF ENERGY VIJAY A SATYAL SENIOR POLICY ANALYST		625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us
W	ANNALA, CAREY, BAKER, ET AL., PC WILL K CAREY		PO BOX 325 HOOD RIVER OR 97031 wcarey@hoodriverattorneys.com
W	CITIZEN'S UTILITY BOARD OF OREGON G. CATRIONA MCCrackEN LEGAL COUNSEL/STAFF ATTY		610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org
W	CITIZENS' UTILITY BOARD OF OREGON ROBERT JENKS		610 SW BROADWAY STE 308 PORTLAND OR 97205

bob@oregoncub.org

W COMMUNITY RENEWABLE ENERGY ASSOCIATION

PAUL R WOODIN
EXECUTIVE DIRECTOR

1113 KELLY AVE
THE DALLES OR 97058
pwoodin@communityrenewables.org

DAVISON VAN CLEVE

IRION A SANGER
ASSOCIATE ATTORNEY

333 SW TAYLOR - STE 400
PORTLAND OR 97204
ias@dvclaw.com

DEPARTMENT OF JUSTICE

MICHAEL T WEIRICH
ASSISTANT ATTORNEY GENERAL

REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

W IDAHO POWER COMPANY

RANDY ALLPHIN

PO BOX 70
BOISE ID 83707-0070
rallphin@idahopower.com

CHRISTA BEARRY

PO BOX 70
BOISE ID 83707-0070
cbearry@idahopower.com

BARTON L KLINE
SENIOR ATTORNEY

PO BOX 70
BOISE ID 83707-0070
bkline@idahopower.com

MICHAEL YOUNGBLOOD
SENIOR PRICING ANALYST

PO BOX 70
BOISE ID 83707
myoungblood@idahopower.com

W MCDOWELL & RACKNER PC

WENDY MCINDOO
OFFICE MANAGER

520 SW 6TH AVE STE 830
PORTLAND OR 97204
wendy@mcd-law.com

LISA F RACKNER
ATTORNEY

520 SW SIXTH AVENUE STE 830
PORTLAND OR 97204
lisa@mcd-law.com

OREGON PUBLIC UTILITY COMMISSION

ED DURRENBERGER

PO BOX 2148
SALEM OR 97308-2148
ed.durrenberger@state.or.us

W PACIFIC POWER & LIGHT

JORDAN A WHITE
SENIOR COUNSEL

825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
jordan.white@pacificorp.com

W PACIFICORP, DBA PACIFIC POWER

PACIFIC POWER OREGON DOCKETS

825 NE MULTNOMAH STREET, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

PORTLAND GENERAL ELECTRIC

RANDALL DAHLGREN
RATES & REGULATORY AFFAIRS

121 SW SALMON ST - 1WTC1711
PORTLAND OR 97204
pge.opuc.filings@pgn.com

**PORTLAND GENERAL ELECTRIC
COMPANY**

J RICHARD GEORGE
ASST GENERAL COUNSEL

121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

RFI CONSULTING INC

RANDALL J FALKENBERG

PMB 362
8343 ROSWELL RD
SANDY SPRINGS GA 30350
consultrfi@aol.com
