

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1276

In the Matter of THE PUBLIC UTILITY)
COMMISSION OF OREGON Staff's) PETITION TO INTERVENE LATE OF
request to open an investigation regarding) RENEWABLE NORTHWEST PROJECT
performance-based ratemaking)
mechanisms to address potential build-vs.-)
buy bias.)
)

Pursuant to OAR 860-11-065, Renewable Northwest Project petitions to intervene as a “party” in this proceeding. Petitioner is aware that a schedule has already been established in the proceeding, and it agrees to follow the schedule and not to seek to change the schedule.

1. The name and address of the petitioner is:

Renewable Northwest Project
917 S.W. Oak, Suite 303
Portland, Oregon 97205
ann@rnp.org

2. The name and address of the attorneys representing the petitioner is:

John W. Stephens, Esq.
Esler, Stephens & Buckley
888 S.W. Fifth, Suite 700
Portland, Oregon 97204-2021
stephens@eslerstephens.com

3. Petitioner requests that service of documents also be made on:

Ann Gravatt
Renewable Northwest Project
917 S.W. Oak, Suite 303
Portland, Oregon 97205
ann@rnp.org

4. Petitioner is an advocacy organization whose members include environmental and consumer groups, and businesses who are involved in the development and manufacture of

renewable energy projects and products. The purpose of the group is to promote the implementation of environmentally sound, workable renewables in the Northwest.

5. Many of RNP's business members develop and construct renewable energy projects in the Northwest, with the hope of selling the power and/or the project to a utility. RNP is interested in ensuring equitable resource acquisition practices by utilities for all energy resources. Performance-based ratemaking methods that may eliminate a "build vs. buy" bias is one way to accomplish that goal.

6. Petitioner and its counsel have appeared in the related dockets to this proceeding, including Docket Nos. UM 1066, UM 1182 and UM 1056, as well as numerous utility Integrated Resource Plan and Request for Proposal dockets. In addition, Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

7. Petitioner recognizes significant work has been accomplished to date in this proceeding and has contacted the other Parties before filing this Motion. The following parties do not object to RNP's intervention: NIPPC, CUB, NWECA, PacifiCorp, PGE and Staff. Petitioner has left a message for counsel for Idaho Power and Praise the Wind, LLC.

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8. Petitioner has sufficient interest in the proceeding and the petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

9. Petitioner waives paper service of documents.

DATED this 9th day of February, 2007.

ESLER, STEPHENS & BUCKLEY

By: /s/ John W. Stephens
John W. Stephens
Of Attorneys for Renewable Northwest
Project

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE LATE OF RENEWABLE NORTHWEST PROJECT** on the following persons on February 9, 2007, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

| | |
|---|--|
| Steven Weiss steve@nwenergy.org Senior Policy Associate Northwest Energy Coalition 4422 Oregon Trail Court N.E. Salem, Oregon 97305 | <input type="checkbox"/> by hand-delivery <input type="checkbox"/> by facsimile <input type="checkbox"/> by first class mail <input type="checkbox"/> by certified mail, return receipt requested <input type="checkbox"/> by registered mail, return receipt requested <input type="checkbox"/> by express mail <input checked="" type="checkbox"/> by e-mail |
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DATED this 9th day of February, 2007.

ESLER STEPHENS & BUCKLEY

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