

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP, dba PACIFIC POWER,	)	CASE NO. UM 1729
	)	
Application to Update Schedule 37 Qualifying Facility Information	)	PETITION TO INTERVENE OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION
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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  
1113 Kelly Ave  
Dalles, OR 97058  
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:

Gregory M. Adams (OSB No. 101779) Richardson Adams, PLLC 515 N. 27 <sup>th</sup> Street Boise, Idaho 83702 Telephone: 208-938-2236 Fax: 208-938-7904 <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>	Brian Skeahan PMB 409 18160 Cottonwood Rd. Sun River, Oregon 97707 Telephone: 360-431-5072 <a href="mailto:brian.skeahan@yahoo.com">brian.skeahan@yahoo.com</a>
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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"), including OPUC dockets UM 1129, UM 1396, UM 1442, UM 1443, UE 245, UM 1610, UM 1725, UM 1734, and DR 46. CREA has also recently intervened or actively participated in proceedings before the Federal Energy Regulatory Commission ("FERC") that affect Oregon qualifying facilities ("QFs"), including dockets RM13-2 (regarding small generator interconnection rules) and EL15-6 & EL16-16 (*PaTu Wind Farm, LLC v. Portland General Electric Co.*).

6. Because the outcome of this proceeding will affect the calculation of avoided cost rates available for community renewable energy projects to sell their output to PacifiCorp, CREA has a direct and substantial interest in this matter.

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.

RESPECTFULLY SUBMITTED this 30th day of March, 2016.

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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Gregory M. Adams (OSB No. 101779)  
Of Attorneys for the Community Renewable  
Energy Association