

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1752**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) RENEWABLE ENERGY COALITION  
COMPANY, ) PETITION TO INTERVENE  
 )  
 )  
Revised Schedule 201 Qualifying Facility )  
Information, Consistent with the 2013 )  
Integrated Resource Plan Update )  
 )  
 )  
\_\_\_\_\_ )

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“REC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, REC provides the following information:

The name and address of REC is:

Renewable Energy Coalition  
Attn: John Lowe  
12050 SW Tremont Street  
Portland, OR 97225  
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent REC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Irion A. Sanger  
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REC was established in 2009, and is comprised of over thirty members that are small qualifying facilities (“QFs”) who own and operate about fifty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, special service districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts.

Portland General Electric Company’s (“PGE”) filing could have a substantial impact on REC’s members. PGE has requested that the Commission update its avoided costs based on an integrated resource plan update that has not been acknowledged by the Commission. PGE’s proposals could result in a significant change in the Commission’s existing policy regarding out-of-cycle avoided cost updates that would harm all independent power producers in Oregon.

REC’s members have power purchase agreements (“PPAs”) with Oregon investor owned electric utilities with rates based on the utilities’ avoided costs. REC’s members also sell power to Idaho Power and PacifiCorp in Idaho, Washington, Wyoming, and Utah. Most of REC’s members are existing projects that have operating and selling to Oregon utilities for numerous years. In addition, REC’s members purchase back up, station service, and other electrical needs from utilities. This proceeding could impact the avoided cost rates paid to REC’s members. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and

Oregon. REC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities. REC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, REC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 28th day of December 2015.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

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Of Attorneys for the Renewable Energy Coalition