

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 1794, and DR 46. CREA has also 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), EL15-6 & EL16-16 (*PaTu Wind Farm, LLC v. Portland General Electric Co.*), and AD16-16 (Implementation Issues Under the Public Utility Regulatory Policies Act of 1978).

6. Because the outcome of this proceeding may affect the calculation of avoided cost rates available for community renewable energy projects to sell their output to Oregon utilities as

QFs, 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 29th day of November, 2016.

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