

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1930**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Community Solar Program Implementation

RENEWABLE ENERGY  
COALITION'S  
PETITION TO INTERVENE

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

The name and address of Coalition is:

Renewable Energy Coalition  
Attn: John Lowe  
PO Box 25576  
Portland, OR 97298  
Telephone: (503) 717- 5375  
E-Mail: jravenesanmarcos@yahoo.com

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

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The Coalition was established in 2009 and is comprised of nearly forty members who own and operate over fifty qualifying facilities (“QFs”) or are attempting to develop new QF projects in Oregon, Idaho, Washington, Utah, Montana and Wyoming. The Commission’s Implementation of the Community Solar Program will directly impact the interests of the Coalition’s members given the Staff position that a Community Solar Program Project must be a QF under PURPA.<sup>1</sup> Relatedly, Staff proposed changes to Oregon’s small generator interconnection rules used for interconnecting QFs. The Coalition’s interest in this docket extends to issues that affect the interests of QFs in the interconnection process and otherwise.

The Coalition has participated in numerous regulatory proceedings intended to promote appropriate interconnection procedures, competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. The Coalition’s executive director, John Lowe, participated in Docket No. AR 521 through which the Commission adopted the current small generator interconnection rules. Since those rules were adopted, the Coalition has monitored their implementation and can provide the

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<sup>1</sup> Staff Draft Proposal for Community Solar interconnection at Attachment A Department of Justice Interoffice Memo re CSP Projects as QFs (June 19, 2019).

Commission with a small QF perspective regarding how well the process is working and what issues QFs experience. The Coalition's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, the Coalition's interest is not adequately represented by any other party in this proceeding.

WHEREFORE, the Coalition 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 8th day of October 2019.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition