

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 74

In the Matter of

IDAHO POWER COMPANY

2019 Integrated Resource Plan

RENEWABLE ENERGY
COALITION'S
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“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 Law, 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:

John Lowe
Renewable Energy Coalition
PO Box 25576
Portland, OR 97298
Telephone: (503) 717- 5375
Fax: (503) 717- 5092
jravenesanmarcos@yahoo.com

Irion Sanger
Sanger Law, PC
1041 SE 58th Pl
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

Marie Phillips Barlow
Sanger Law, PC
1041 SE 58th Pl
Portland, OR 97215
Telephone: (503) 420-7734
Fax: (503) 334-2235
marie@sanger-law.com

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 projects in Oregon, Idaho, Washington, Utah, Montana and Wyoming.

Idaho Power’s 2019 integrated resource plan (“IRP”) could have a direct and substantial impact on Coalition’s members. The IRP represents Idaho Power’s commitment to develop a long-term resource plan that considers cost, risk, uncertainty, and the long-run public interest. The IRP will form the foundation for Idaho Power’s future generation, demand side management, and transmission investments.

The IRP will impact Idaho Power’s retail rates as well as its avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). Coalition’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with Oregon utilities with rates based on its avoided costs. Coalition’s members also sell power to Portland General Electric, Idaho Power and PacifiCorp in Oregon, Idaho, Washington, Wyoming, and/or Utah. Most of Coalition’s members are existing projects that have operating and selling to utilities for numerous years; however, many Coalition members are attempting to construct new renewable energy projects. Without intervention, Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

Coalition has participated in numerous regulatory proceedings intended to promote competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding QF PPA and rate eligibility. 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, Coalition's interest is not adequately represented by any other party in this proceeding.

WHEREFORE, 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 18th day of March 2020.

Respectfully submitted,



Irion Sanger
Joni Sliger
Sanger Law, PC
1041 SE 58th Pl
Portland, OR 97215
Telephone: (503)756-7533
Fax: (503)334-2235
irion@sanger-law.com

Attorneys for the Renewable Energy Coalition