

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2060**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Update to Schedule 201 - As-Available Rate

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 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:

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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 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 members include QFs that intend to sell power to PGE under the Community Solar Program.

PGE proposed to update terms for its Schedule 201 Qualifying Facility 10 MW or Less Avoided Cost Power Purchase Information (Schedule 201), and for its Schedule 202 Qualifying Facilities Greater than 10MW Avoided Cost Power Purchase Information (Schedule 202) with a requested effective date of April 8, 2020. Specifically, PGE requests that the Commission establish an “As-available Rate.” The Coalition strongly opposes PGE’s filing as not be fair, just or reasonable, and inconsistent with the Oregon and federal Public Utility Regulatory Policies Act. 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 18th day of March 2020.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition