

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 62

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER's)	RENEWABLE ENERGY COALITION
)	PETITION TO INTERVENE
2015 Integrated Resource Plan.)	
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_____)	

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

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

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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 nearly forty non-intermittent renewable energy generation facilities in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts. Most of REC’s members are existing projects that have been operating and selling to Oregon utilities for numerous years.

PacifiCorp’s 2015 integrated resource plan (“IRP”) could have a direct and substantial impact on REC’s members. The IRP represents PacifiCorp’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 PacifiCorp’s future generation, demand side management, and transmission investments. The IRP will impact PacifiCorp’s retail rates as well as its avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). REC’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with PacifiCorp with rates

based on its avoided costs. In addition, REC's members purchase back up, station service, and other electrical needs from PacifiCorp. Therefore, this proceeding could impact the avoided cost rates paid to, and electric power rates paid by, 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 otherwise fully participate in the proceedings.

Dated this 9th day of April, 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