BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 73

In the Matter of	PETITION TO INTERVENE OF RENEWABLE NORTHWEST
PORTLAND GENERAL ELECTRIC COMPANY,	
2019 Integrated Resource Plan.	
Renewable Northwest petitions to intervene in this proceeding. In support of this petition, the following is provided:	
1. The contact information (name, address, email address) of the petitioner is:	
Name: Silvia Tanner Company: Renewable Northwest Street Address: 421 SW 6 th Avenue, Suite 975 City, State, Zip: Portland, OR 97204 Email Address: silvia@renewablenw.org Telephone: 503-223-4544 Please include this contact on the service list.	
2a. The petitioner \(\subseteq \text{will } \subseteq will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is listed under #1, above.	
2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):	

Name: Renewable NW Dockets Company: Renewable Northwest

Street Address: 421 SW 6th Avenue, Suite 975

City, State, Zip: Portland, OR 97204

Email Address: dockets@renewablenw.org

Telephone: 503-223-4544

Name: Michael O'Brien Company: Renewable Northwest

Street Address: 421 SW 6th Avenue, Suite 975

City, State, Zip: Portland, OR 97204

Email Address: michael@renewablenw.org

Telephone: 503-223-4544

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Renewable Northwest is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. We have 57 member organizations that include renewable energy developers and manufacturers, as well as consumer advocates, environmental groups, academic institutions, and other industry advisers. The common goal of our members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment.

☐ List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Renewable Northwest is interested in ensuring that the utility resource planning process is properly designed and conducted so that it can accurately assess the contribution of renewable resources and storage to the utility's system. Portland General Electric Company's Integrated Resource Plan ("IRP") could directly impact renewable development in the region. We have members with an interest in renewable development in the region. Therefore, we have a direct and substantial interest in this proceeding. No other party can adequately represent Renewable Northwest's interest in this proceeding.

5. The issues the Petitioner intends to raise at the proceeding are:

Renewable Northwest intends to participate as a party and raise issues that are appropriate to the proceeding.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Renewable Northwest has a long-standing history of participating in regulatory proceedings and stakeholder processes related utility resource planning. Specifically, we have actively participated in workshops and technical discussions related to this and prior PGE IRPs.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Northwest respectfully requests that the Commission grant this Petition to Intervene. It is in the public interest to allow Renewable Northwest to intervene in this proceeding. Moreover, Renewable Northwest's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Respectfully submitted this 23rd day of May, 2019.

/s/ Silvia Tanner
Silvia Tanner, Staff Counsel
silvia@renewableNW.org

Exhibit A

Renewable Northwest Members (May 2019)

174 Power Global

3Degrees

7Skyline

Advance Energy

American Wind Energy Association

Avangrid Renewables

Bonneville Environmental Foundation

Capital Power

Center for Energy Efficiency & Renewable

Technologies

Clearway Energy Group

Citizens' Utility Board of Oregon

Climate Solutions

Community Renewable Energy Association

Cypress Creek Renewables

Davis Wright Tremaine LLP

DNV GL

Ecoplexus

EDF Renewable Energy

EDP Renewables North America LLC

Environment Oregon

Environment Washington

Eurus Energy America

Geothermal Resources Council

Green Mountain Energy Company

Idaho Conservation League

Invenergy

K&L Gates

Kapla Law PLLC

Latitude45 Associates

MAP

Montana Environmental Information Center

MontPIRG

Natural Resources Defense Council

Neoen

NextEra Energy Resources

Northwest Environmental Business Council

NW Energy Coalition

OneEnergy Renewables

Oregon Solar Energy Industries Association

OSPIRG

Oregon Tech

Orion Renewable Energy Group LLC

Pattern Energy

Renewable Hydrogen Alliance

S-Power

Scout Clean Energy

Solar Oregon

Spark Northwest

Stoel Rives, LLP

Sulus Solar

SWCA Environmental Consultants

Tetra Tech

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates