

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 78

In the Matter of

IDAHO POWER COMPANY

2021 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 (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 the Coalition is:

Renewable Energy Coalition
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Portland, OR 97298
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E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent the 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 about forty members who own and operate over fifty qualifying facilities (“QFs”) or are attempting to develop new QF projects in Oregon, Idaho, Montana, Utah, Washington, and Wyoming.

Idaho Power’s 2021 integrated resource plan (“IRP”) could have a direct and substantial impact on the 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”). The Coalition’s members are QFs that have (or intend to have) power purchase agreements with Oregon utilities with rates based on its avoided costs. Most of the Coalition’s members are existing projects that have been operating and selling to utilities for numerous years; however, many members are attempting to construct new renewable

energy projects. Without intervention, the Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

The 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 qualifying facility contract and rate eligibility. 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 17th day of January 2022.

Respectfully submitted,

/s/ Ellie Hardwick
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Of Attorneys for the Renewable Energy Coalition