

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER

Request for a General Rate Revision.

Petition to Intervene of Renewable
Northwest Project

Pursuant to OAR 860-001-0300(2), Renewable Northwest Project ("RNP") petitions the Public Utility Commission ("Commission") to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information for RNP to be included on the service list is:

Megan Walseth Decker
Renewable Northwest Project
421 SW 6th Avenue, Suite 1100
Portland, OR 97204
(503) 223-4544
megan@rnp.org

2. RNP will be represented in this proceeding by John W. Stephens of Esler, Stephens & Buckley. The contact information for RNP's counsel to be included on the service list is:

John W. Stephens, Esq.
Esler, Stephens & Buckley
888 SW Fifth Avenue, Suite 700
Portland, OR 97204-2021
stephens@eslerstephens.com; mec@eslerstephens.com

3. RNP requests that electronic service of documents also be made on:

Jimmy Lindsay
Renewable Northwest Project
421 SW 6th Avenue, Suite 1100
Portland, OR 97204
(503) 223-4544
jimmy@rnp.org

4. RNP is a non-profit advocacy organization with more than 50 members, including public interest groups and businesses. A list of RNP's members is attached as Exhibit A. RNP seeks to promote the expansion of environmentally responsible renewable energy resources across the Northwest region.

5. RNP has a substantial interest in examination of proposed rate increases due to investments in coal plant pollution control upgrades. RNP has been engaged in forward-looking discussions of this issue in LC 52, and plans to monitor evaluation of these investments in the present docket as well. RNP's interest in this proceeding will not be represented by any other party.

6. RNP has extensive experience with regulatory proceedings involving integrated resource planning, renewable portfolio standard implementation, procurement of renewable resources, and other issues. RNP's counsel has been involved in many general rate cases.

7. RNP's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.

8. RNP waives paper service of documents.

DATED this 23rd day of March, 2012.

RENEWABLE NORTHWEST PROJECT

By: 

Megan Walseth Decker
Senior Staff Counsel

k:\maureen\rnp\ue 246\petition to intervene.docx

Exhibit A
Renewable Northwest Project Members (March 2012)

3Degrees
American Wind Energy Assoc.
Blattner Energy
Bonneville Environmental Foundation
BP Wind Energy
Calpine Corporation
Center for Energy Efficiency & Renewable
Technologies
CH2M Hill
Christenson Electric
Citizens' Utility Board
Climate Solutions
Clipper Windpower Development
Columbia Energy Partners
Columbia Gorge Community College
Community Renewable Energy Association
E.ON Climate & Renewables
EDP Renewables North America LLC
Element Power
Environment Oregon
Environment Washington
enXco, Inc.
Eurus Energy America
EverPower
First Wind
Gaelectric
Gamesa Energy USA
GE Energy
Geothermal Resources Council
GL Garrad Hassan
Green Mountain Energy Company
Iberdrola Renewables
Jones Stevedoring Company
Kapla Law PLLC
Lane Powell PC
MAP
Montana Environmental Information Center
MontPIRG
Natural Capital Partners

Natural Resources Defense Council
NaturEner
NextEra Energy Resources
Northwest Environmental Business Council
NW Energy Coalition
Oregon Solar Energy Industries Association
OSPIRG
Port of Vancouver, USA
Portland Energy Conservation, Inc.
REC Silicon
RES America Developments, Inc.
Ridgeline Energy
Solar Oregon
SolarCity
Stoel Rives, LLP
SunPower Corporation
Suzlon Wind Energy Corporation
SWCA Environmental Consultants
Tanner Creek Energy
Tonkon Torp LLP
Vestas Americas
Warm Springs Power & Water Enterprises
Washington Environmental Council
WashPIRG
Western Resource Advocates

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT** on the following persons on March 23, 2012:

Kurt J. Boehm, Esq.
kboehm@bkllawfirm.com
Boehm Kurtz & Lowry
36 E. 7th Street, Suite 2110
Cincinnati, Ohio 45202

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Jody Kyler, Esq.
jkyler@bkllawfirm.com
Boehm Kurtz & Lowry
36 E. 7th Street, Suite 2110
Cincinnati, Ohio 45202

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

OPUC Dockets
dockets@oregoncub.org
Citizens' Utility Board of Oregon
610 S.W. Broadway, Suite 308
Portland, Oregon 97205

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Bob Jenks
bob@oregoncub.org
Executive Director
Citizens' Utility Board of Oregon
610 S.W. Broadway, Suite 308
Portland, Oregon 97205

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

G. Catriona McCracken, Esq.
catriona@oregoncub.org
Staff Attorney
Citizen's Utility Board of Oregon
610 S.W. Broadway, Suite 308
Portland, Oregon 97205

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Irion A. Sanger, Esq.
mail@dvclaw.com
Davison Van Cleve
333 S.W. Taylor, Suite 400
Portland, Oregon 97204

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Melinda J. Davison, Esq.
mail@dvclaw.com
Davison Van Cleve, PC
333 S.W. Taylor, Suite 400
Portland, Oregon 97204

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Kevin Higgins
khiggins@energystrat.com
Energy Strategies, LLC
215 State Street, Suite 200
Salt Lake City, Utah 84111-2322

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Wendy Gerlitz
wendy@nwenergy.org
NW Energy Coalition
1205 S.E. Flavel
Portland, Oregon 97202

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

R. Bryce Dalley
bryce.dalley@pacificorp.com
Pacific Power
825 N.E. Multnomah Street, Suite 2000
Portland, Oregon 97232

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Sarah Wallace
sarah.wallace@pacificorp.com
Pacific Power
825 N.E. Multnomah Street, Suite 1800
Portland, Oregon 97232

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

PacificCorp Oregon Dockets
oregondockets@pacificorp.com
825 N.E. Multnomah, Suite 2000
Portland, Oregon 97232

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Randall Dahlgren
randy.dahlgren@pgn.com
Portland General Electric Company
121 S.W. Salmon Street, 1WTC 0702
Portland, Oregon 97204

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Douglas C. Tingey, Esq.
doug.tingey@pgn.com
Assistant General Counsel
Portland General Electric Company
121 S.W. Salmon Street, 1WTC 1301
Portland, Oregon 97204

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Deborah Garcia
deborah.garcia@state.or.us
Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Michael T. Weirich
michael.weirich@doj.state.or.us
Department of Justice
Regulated Utility & Business Section
1162 Court Street N.E.
Salem, Oregon 97301-4096

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Donald W. Schoenbeck
dws@r-c-s-inc.com
Regulatory & Cogeneration Services, Inc.
900 Washington Street, Suite 780
Vancouver, Washington 98660-3455

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Jeff Speir
jeff.speir@sierraclub.org
Sierra Club
85 Second Street, 2nd Floor
San Francisco, California 94105

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Gloria D. Smith
gloria.smith@sierraclub.org
Sierra Club Law Program
85 Second Street
San Francisco, California 94105

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

Megan Walseth Decker
megan@rnp.org
Renewable Northwest Project
917 S.W. Oak, Suite 303
Portland, Oregon 97205

- ☐ by hand-delivery
- ☐ by facsimile
- ☐ by first class mail
- ☒ by e-mail

DATED this 23rd day of March, 2012.

RENEWABLE NORTHWEST PROJECT

By: 

Megan Walseth Decker
Senior Staff Counsel
megan@rnp.org