JOHN W. STEPHENS

Email: <u>STEPHENS@ESLERSTEPHENS.COM</u>

DIRECT DIAL: (503) 935-5393

October 24, 2008

Via Electronic and First Class Mail

Filing Center Public Utility Commission P.O. Box 2148 Salem, Oregon 97308-2148

Re: Open an investigation into electric companies providing Qualified Reporting Entity services for certification of renewable energy certificates by the Western Renewable Energy Generation Information System, PUC Docket No. UM 1394—Petition to Intervene of Renewable Northwest Project

Dear Filing Center:

Enclosed please find an original and one copy of Petition to Intervene of Renewable Northwest Project ("RNP"). RNP waives paper service of documents in this docket.

Yours truly,

/s/ John W. Stephens

John W. Stephens

JWS/mec cc: Service List Enclosures

K:\Maureen\RNP\UM 1394\PUC 1 ltr.doc

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1394

In the Matter of)
) PETITION TO INTERVENE OF
PUBLIC UTILITY COMMISSION OF) RENEWABLE NORTHWEST PROJECT
OREGON	
Open an investigation into electric)
1)
companies providing Qualified Reporting)
Entity services for certification of)
renewable energy certificates by the)
Western Renewable Energy Generation)
Information System.)

Pursuant to OAR 860-012-0001, Renewable Northwest Project petitions to intervene as a

"party" in this proceeding.

1. The name and address of the petitioner is:

Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 ann@rnp.org

2. The name and address of the attorneys representing the petitioner is:

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

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

Ann Gravatt
Renewable Northwest Project
917 S.W. Oak, Suite 303
Portland, Oregon 97205
ann@rnp.org

and on

Katie Kalinowski Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 katie@rnp.org

- 4. Petitioner is an advocacy organization whose members include environmental and consumer groups, and businesses who are involved in the development and manufacture of renewable energy projects and products. The purpose of the group is to promote the implementation of environmentally sound, workable renewables in the Northwest.
- 5. Petitioner and its counsel have appeared in numerous utility Integrated Resource Plan dockets. In addition, Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission is resolving the issues in the proceeding.
- 6. Petitioner has sufficient interest in the proceeding, and petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. Petitioner is interested in all issues that relate to compliance with SB 838, Oregon's Renewable Energy Act.
 - 7. Petitioner waives paper service of documents.

DATED this 24th day of October, 2008.

ESLER, STEPHENS & BUCKLEY

By:	/s/ John W. Stephens
·	John W. Stephens
	Of Attorneys for Renewable Northwest
	Project

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF** RENEWABLE NORTHWEST PROJECT on the following persons on October 24, 2008, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

PacifiCorp Power Oregon Dockets oregondockets@pacificorp.com 825 N.E. Multnomah, Suite 2000 Portland, Oregon 97232	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Melinda J. Davidson, Esq. mjd@dvclaw.com Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Michael T. Weirich michael.weirich@doj.state.or.us Assistant AG Department of Justice Reg Utility & Business Section 1162 Court Street N.E. Salem, Oregon 97301-4096	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Lisa C. Schwartz lisa.c.schwartz@state.or.us Senior Analyst Public Utility Commission of Oregon P.O. Box 2148 Salem, Oregon 97308-2148	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Ann English Gravatt ann@rnp.org Katie Kalinowski katie@rnp.org Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail

Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Randall J. Falkenberg consultrfi@aol.com RFI Consulting, Inc. PMB 362 8343 Roswell Road Sandy Springs, Georgia 30350	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail
Debra Malin, Esq. djmalin@bpa.gov Bonneville Power Administration 905 N.E. 11 th Avenue Portland, Oregon 97208	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail
J. Courtney Olive, Esq. jcolive@bpa.gov Bonneville Power Administration 905 N.E. 11 th Avenue Portland, Oregon 97208	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail
Jeremy Weinstein, Esq. jeremy.weinstein@pacificorp.com Pacific Power & Light 1512 Bonanza Street Walnut Creek, California 94596	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail
Jordan White jordan.white@pacificorp.com Pacific Power & Light 825 N.W. Multnomah, Suite 1800 Portland, Oregon 97232	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail
Randall Dahlgren pge.opuc.filings@pgn.com Portland General Electric 121 S.W. Salmon, 1WTC 0702 Portland, Oregon 97204	 □ by hand-delivery □ by facsimile □ by first class mail □ by certified mail, return receipt requested □ by registered mail, return receipt requested □ by express mail □ by e-mail

ESLER, STEPHENS & BUCKLEY Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

ed sted

 $K: \label{eq:maureen} NP\ UM\ 1394\ Certserv.doc$

ESLER, STEPHENS & BUCKLEY Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995