

U.S. Geothermal Inc.
UM 1394 (QRE Investigation)
Petition to Intervene as a Party
Waiver of Paper Service

Submitted by:
U.S. Geothermal, Inc.
1505 Tyrell Lane
Boise, ID 83706

Via Electronic and First Class Mail

October 30, 2008

Public Utility Commission of Oregon
Attn: Filing Center
PO BOX 2148
Salem, OR 93708-2148

Dear Filing Center:

Waiver of Paper Service

U.S. Geothermal Inc waives paper service. Please use electronic service to the following U.S. Geothermal employees:

Kevin Kitz kkitz@usgeothermal.com
Shauna Pratt spratt@usgeothermal.com

Petition to Intervene as a Party

Pursuant to OAR860-012-0001, U.S. Geothermal Inc. (“USGeo”) petitions to intervene as a Party in UM 1394.

Name and Address of Petitioner

U.S. Geothermal Inc.
1505 Tyrell Lane
Boise, ID 83706

Ph: 208-424-1027
Fax: 208-424-1030

Representative of the Petitioner

Kevin Kitz and Shauna Pratt.

Written notices may be sent to the above address. Both representatives may be contacted at the phone number and e-mail address provided.

If Petitioner is an Organization: Type of Organization, Number of Employees

USGeo is a geothermal development company with two operating power plants. One is in Idaho and one is in Nevada. We are in the process of developing additional geothermal sites, including one in Oregon, near Vale, which is known as the Neal Hot Springs project.

USGeo has 28 employees between our Boise corporate office and our two operations sites.

Nature and extent of interest in proceeding

USGeo has RECs that it owns from its Raft River plant in Idaho, will have RECs from its planned expansion of its San Emidio, NV site, and will have RECs from its Neal Hot Springs, OR site. USGeo has concern that its existing and planned projects will either be unable to obtain QRE registration, or will have to pay high fees for the service. The Oregon PUC will set a precedent for other western PUC's to consider when the issue comes before them, and therefore the OPUC's ruling has the potential to affect not only USGeo's Oregon Project, but all of USGeo's projects anywhere in the West.

Issues Petitioner Plans to Raise at the Proceedings:

QREs have refused service at many documented QFs around the West besides those in Oregon. QREs should be obligated to provide the service if petitioned to do so. The effort involved for the QRE's is minimal, and therefore the charges should be negligible. We believe that high QRE fees are an attempt at profit-sharing of green power benefits by the QRE that has no stake, equity, or legitimate financial interest in the renewable benefits. A QRE's refusal to register the RECs with WREGIS will create yet another barrier to the development of renewable energy projects. Lastly, we believe that if the QRE is a party to the renewable project, as either a purchaser of power or RECs, then the QRE should provide WREGIS registration service at no charge.

Special Knowledge or Expertise that will be of Assistance to the PUC:

USGeo can share its experience with WREGIS, and provide evidence that the low cost of using this system justifies that QRE fees should be minimal. We have detailed information on the cost of metering from our geothermal project that started up in late 2007. We have expertise in the value of RECs and in the value that RECs bring to a renewable energy project, and how that value is critical to the viability of constructing new geothermal (and other renewable energy) projects.

Electronic Copy

An electronic copy of this petition is being sent to PUC.filingcenter@state.or.us

Hard Copy

One hardcopy original is being mailed to:
Public Utility Commission of Oregon
Attn: Filing Center
PO BOX 2148
Salem, OR 93708-2148

Certificate of Service

A certificate of service is attached, with a list of parties being served.

Thank you for considering this petition by U.S. Geothermal Inc. to be an intervenor.

Sincerely,

Kevin Kitz
VP – Project Development
U.S. Geothermal Inc.

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Thank you for considering this petition by U.S. Geothermal Inc. to be an intervenor.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Kitz", with a large, stylized flourish at the end.

Kevin Kitz
VP – Project Development
U.S. Geothermal Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31th day of October, 2008 a true and correct copy of the within and foregoing PETITION TO INTERVENE and NOTICE OF WAIVER OF PAPER SERVICE BY U.S. GEOTHERMAL INC. was filed with the Public Utility Commission of Oregon and parties as indicated below:

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By: 
Nina M. Curtis