BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1442

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Renewable Energy Coalition

PETITION TO INTERVENE AND WAIVER OF SERVICE BY POST

NAME OF PETITIONER: Renewable Energy Coalition ADDRESS: c/o PO Box 1211, 24525 E. Welches Road, Suite 7 PHONE NUMBER: 503.622.3123 FAX NUMBER: 503.622.1438 E-MAIL ADDRESS: jravensanmarcos@yahoo.com

NAME OF COUNSEL FOR PETITIONER: Thomas H. Nelson COUNSEL'S ADDRESS: PO Box 1211 COUNSEL'S PHONE NUMBER: 503.622.3123 COUNSEL'S FAX NUMBER: 503.622.1438 COUNSEL'S E-MAIL ADDRESS: <u>nelson@thnelson.com</u>

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

At the present there are approximately five members, each of which is an irrigation district that has or hopes to have power-purchase agreements with PacifiCorp. The purpose of the organization is to assist such districts and any other entities so interested in achieving fair and just terms and conditions in such power-purchase agreements.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner requests full party status in order to address all aspects of the investigation in to PacifiCorp's recent avoided-cost filing.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING: Whether PacifiCorp's filing complies with applicable federal and Oregon law.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

Representatives of Petitioner have been involved in avoided-cost matters in Oregon since the passage of the Public Utility Regulatory Policies Act of 1978, both on behalf of investor-owned utilities and on behalf of cogenerators and small power producers.

Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Energy Coalition requests to participate in this proceeding as an intervenor. Renewable Energy Coalition will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001.

The undersigned hereby consents to receipt of all materials related to this docket by electronic transmission to the email address specified above.

DATED: September 15, 2009

Respectfully submitted,

lomas /

Thomas H. Nelson, OSB 78315 Petitioner's Representative PO Box 1211 24525 E. Welches Road, Suite 7 Welches, OR 97067-1211 nelson@thnelson.com

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing RENEWABLE ENERGY COALITION'S PETITION TO INTERVENE on all parties of record as set forth below in this proceeding through electronic filing pursuant to OAR 860-133-0070 upon persons/entities who have waived filing by U.S. Post.

Ed Durrenberger	Carel deWinkel	Tom Elliott
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DATED at Welches, Oregon, this 15th day of September, 2009.

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Thomas H. Nelson OSB 78315