

RICHARD G. LORENZ

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May 26, 2015

# VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission Attn: Filing Center 3930 Fairview Industrial Drive SE PO Box 1088 Salem OR 97308-1088

> Re: In the Matter of IDAHO POWER COMPANY, Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar Integration Change, and for Change in Resource Sufficiency Determination. **OPUC Docket No. UM 1725**

Dear Filing Center:

Enclosed for filing please find the original and one copy of Cypress Creek Renewables, LLC's Petition to Intervene in the above-referenced proceeding.

Thank you for your assistance with this matter. Should you have any questions, please call.

Very truly yours,

/s/ Richard G. Lorenz

Richard G. Lorenz

RGL:tjb Enclosure cc: UM 1725 Service List

29600.002\4814-7742-4676.v1

Suite 2000, 1001 SW Fifth Avenue, Portland, Oregon 97204-1136 = Phone: 503.224.3092 = Fax: 503.224.3176 = www.cablehuston.com

#### **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

### UM 1725

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In the Matter of

IDAHO POWER COMPANY,

Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar Integration Change, and for Change in Resource Sufficiency Determination. PETITION TO INTERVENE OF CYPRESS CREEK RENEWABLES, LLC

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Cypress Creek Renewables,

LLC ("Cypress Creek") petitions the Public Utility Commission of Oregon ("Commission")

to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7).

Cypress Creek waives paper service of all non-confidential filings. In support of this petition,

Cypress Creek provides the following information:

1. The name and address of Cypress Creek is:

Cypress Creek Renewables, LLC Attn: David Bunge 3250 Ocean Park Blvd, Suite 355 Santa Monica, CA 90405 Phone #: (636) 474-9067 Email: <u>bunge@ccrenew.com</u>

2. The name and address of the attorney representing Cypress Creek is:

Richard G. Lorenz Cable Huston LLP 1001 SW Fifth Avenue, Suite 2000 Portland, OR 97204-1136 (503) 224-3092 (Telephone) (503) 224-3176 (Fax) Email: <u>rlorenz@cablehuston.com</u>

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3. Cypress Creek is a limited liability company that has developed, and that is developing, utility scale solar generating facilities in several states including Oregon. Cypress Creek has sold, and intends to sell, the output of certain of its solar generating facilities pursuant to the terms and conditions of the Public Utility Regulatory Policies Act ("PURPA").

4. Cypress Creek has a direct interest in this proceeding because the outcome of this proceeding may affect how PURPA is implemented with respect to solar generating facilities in Oregon.

5. Cypress Creek's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.

WHEREFORE, Cypress respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

DATED this 26<sup>th</sup> day of May, 2015.

/s/ Richard G. Lorenz Richard G. Lorenz, OSB No. 003086 Cable Huston LLP 1001 SW Fifth Avenue, Suite 2000 Portland, OR 97204-1136 (503) 224-3092 (Telephone) (503) 224-3176 (Fax) rlorenz@cablehuston.com

Attorney for Cypress Creek Renewables, LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **PETITION TO** 

### INTERVENE OF CYPRESS CREEK RENEWABLES, LLC via electronic mail and,

where paper service is not waived, via postage-paid first class mail upon the following parties

of record:

DUSTIN TILL, SENIOR COUNSEL **PACIFIC POWER** 825 NE MULTNOMAH ST., STE 1800 PORTLAND, OR 97232-2149 dustin.till@pacificorp.com

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## IRION A SANGER SANGER LAW PC 1117 SE 53RD AVE PORTLAND OR 97215 irion@sanger-law.com

Dated in Portland, Oregon, this 26<sup>th</sup> day of May, 2015.

/s/ Richard G. Lorenz Richard G. Lorenz, OSB No. 003086 Cable Huston LLP 1001 SW Fifth Avenue, Suite 2000 Portland, OR 97204-1136 (503) 224-3092 (Telephone) (503) 224-3176 (Fax) rlorenz@cablehuston.com

Of Attorneys for the Cypress Creek Renewables, LLC