

PO Box 4120, #33304 Portland, OR 97208 (458) 205-5870 Ryan.Meyer@pacificnorthwestsolar.net

May 18, 2015

Public Utility Commission Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

## Re: In the Matter of Idaho Power Company Docket No. UM 1725

Dear Filing Center:

Enclosed please find the original Petition to Intervene on behalf of Pacific Northwest Solar, LLC in the above-referenced docket.

Respectfully submitted,

/s/Ryan N. Meyer

Ryan N. Meyer Managing Member, VP of Operations, and Representative of Pacific Northwest Solar, LLC

Enclosure

1 2 3 4 5 6 7 8	Ryan N. Meyer Managing Member, VP of Operations and authorized Representative of Claimant Pacific Northwest Solar, LLC (458) 205-5870 ryan.meyer@pacificnorthwestsolar.net 8221 King Road Loomis, CA 95650 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
9 10	In the Matter	r of	Docket No. <u>UM 1725</u>	
11			PACIFIC NORTHWEST SOLAR, LLC'S PETITION TO INTERVENE	
12				
13	Motion for Temporary Stay of Its Obligation to Enter Into New Power Purchase Agreements			
14	With Qualifying Facilities			
15				
16 17	Daaif	a Northwest Solar, LI ( ("DNW?") h	anshu natitions the Oregon Dublic Utility	
17	Pacific Northwest Solar, LLC ("PNW") hereby petitions the Oregon Public Utility			
10	Commission ("Commission"), pursuant to ORS § 756.525 and OAR 860-001-0300, to intervene in			
20	the above captioned proceeding and to appear and participate as a party. In support of its petition,			
20	PNW states all of the following: 1. The name and address of the Intervenor is:			
22	1.	Pacific Northwest Solar, L		
23		PO Box 4120, #33304 Portland, OR 97208		
24		Loomis, CA 95650 (458) 205-5870		
25	2.	PNW will be represented in this d	ocket by its authorized representative:	
26		Ryan N. Meyer, VP of Op	erations	
27	8221 King Road Loomis, CA 95650			
28	(530) 320-4074 ryan.meyer@pacificnorthwestsolar.net			
		COMPLAINT AGAINST I	DAHO POWER COMPANY	

3. Copies of all pleadings, production requests, production responses, Commission 1 2 Orders and other documents in this proceeding should be provided to the following: 3 Ryan N. Meyer 8221 King Road 4 Loomis, CA 95650 (530) 320-4074 5 ryan.meyer@pacificnorthwestsolar.net 6 4. PNW will be affected by the outcome of this proceeding and its interests cannot be 7 adequately represented by any other party to this matter. 8 5. As background, PNW is a regional developer of utility scale solar projects in 9 Eastern Oregon. PNW is the direct owner and developer of nine (9) Qualifying Facility solar 10 energy projects, all located in Malheur County. For each of its projects, PNW has submitted Small Generator Interconnection Applications ("SGIAs") and Energy Sales Agreement 11 12 applications ("ESA applications") to Idaho Power Company ("Idaho Power") pursuant to Oregon 13 Schedule 85 standard ESA program (Tariff E-27). 14 6. In lieu of providing a proposed ESA for each of the projects submitted as required by Schedule 85, Idaho Power informed PNW that it unilaterally chose to deviate from the 15 16 Schedule 85 protocol and simply "responded" by filing the instant request for relief with the 17 Commission (which is really no response at all). Although PNW sought, informally, to have 18 Idaho Power honor its Schedule 85 obligations, such efforts were met with further protests by 19 Idaho Power (again, relying on the erroneous premise that simply filing a Request for a Stay was 20 the functional equivalent of a Stay). PNW thereafter initiated its own Complaint against Idaho 21 Power with this Commission (Docket UM 1731). 22 7. Thereafter, Idaho Power supplemented its filings in this docket, specifically calling 23 out the applications made by PNW (see Idaho Power's Supplement to Motion for Temporary Stay, 24 2:19-26 – though the filing misstates PNW's total power generation application value). This 25 clearly evidences that even Idaho Power sees PNW as a key player in its filings with the Commission. 26 27 28

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1 8. Without the opportunity to intervene, PNW would be without any means to 2 meaningfully participate in this proceeding, which materially impacts PNW and its development 3 activities. The current Motion for a Stay filed by Idaho Power presents an immediate and 4 significant detriment to PNW's projects that are already under way with Idaho Power. Indeed, the 5 uncertainty surrounding the Request for a Stay alone (since Idaho Power has taken the position 6 that their Request allows them to avoid their obligations even for those projects already in the 7 queue) has thrown the development process of PNW's pending projects with Idaho Power into 8 disarray.

9 9. In addition to the immediate issue of the Request for a Stay, the resolution of Idaho
10 Power's concurrently filed "Application to Lower Standard Contract Eligibility Cap and to
11 Reduce the Standard Contract Term," "Application for Approval of Solar Integration Charge," and
12 "Application for Change in Resource Sufficiency Determination" have a potential to impact future
13 development throughout the solar industry, and specifically may have an immediate and lasting
14 impact on PNW's development practices.

15 10. It is in the public interest to grant PNW's Petition to Intervene and granting this
16 request will not unduly broaden the issues or prejudice any other party to this proceeding.

17 WHEREFORE, PNW respectfully request that the Commission grant its Petition to18 Intervene with full party status in this proceeding.

19	Respectfully submitted on May 18, 2015,
20	Respectfully sublitted on Way 16, 2013,
21	/s/Ryan N. Meyer
22	Ryan N. Meyer Authorized Representative of Pacific Northwest
23	Solar, LLC
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