March 31, 2016

421 SW 6TH AVE, Suite 1125 Portland, OR 97204 www.RenewableNW.org 503.223.4544



grees Ation Via Electronic Mail

> Public Utility Commission of Oregon Attn: Filing Center <u>PUC.FilingCenter@state.or.us</u>

> > Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Application to Update Schedule 37 Qualifying Facility Information. Docket No. UM 1729

Dear Filing Center:

Renewable Northwest's Petition to Intervene is enclosed for filing in the above-referenced docket.

Thank you for your assistance, and please do not hesitate to contact our office if you have any questions.

Sincerely,

<u>/s/ Silvia Tanner</u> Silvia Tanner Staff Counsel Renewable Northwest

Renewable Northwest Members

3Degrees American Wind Energy Association Atkins Bonneville Environmental Foundation Center for Energy Efficiency & Renewable Technologies Citizens' Utility Board of Oregon **Climate Solutions** Columbia Gorge Community College Community Renewable Energy Association DNV GL EDF Renewable Energy **EDP** Renewables Environment Oregon **Environment Washington** Eurus Energy America EverPower GE Energy Geothermal Resources Council Green Mountain Energy HDR Engineering, Inc. Iberdrola Renewables Idaho Conservation League Invenergy K&L Gates Kapla Law PLLC MAP Montana Environmental Information Center MontPIRG Natural Resources Defense Council NextEra Energy Resources Northwest Environmental Business Council Northwest SEED NW Energy Coalition **OneEnergy Renewables** Oregon Solar Energy Industries Association OSPIRG Oregon Tech Orion Renewable Energy Group LLC **Principle Power REC Silicon RES America Developments** Solar Oregon Stoel Rives, LLP SunPower Corporation Vestas Americas Warm Springs Power & Water Enterprises Washington Environmental Council WashPIRG Western Resource Advocates

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1729

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

PETITION TO INTERVENE

Application to Update Schedule 37 Qualifying Facility Information.

Renewable Northwest petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name:	Silvia Tanner
Company:	Renewable Northwest
Street Address:	421 SW 6 th Avenue, Suite 1125
City, State, Zip:	Portland, OR 97204
Email Address:	silvia@renewablenw.org
Telephone:	503-223-4544

 \square Please include this contact on the service list.

2a. The petitioner \boxtimes will \square will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is listed under #1, above.

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name:	Renewable NW Dockets
Company:	Renewable Northwest
Street Address:	421 SW 6 th Avenue, Suite 1125
City, State, Zip:	Portland, OR 97204
Email Address:	dockets@renewablenw.org
Telephone:	503-223-4544
Name:	Dina Dubson Kelley
Company:	Renewable Northwest
Street Address:	421 SW 6 th Avenue, Suite 1125
City, State, Zip:	Portland, OR 97204
Email Address:	dina@renewablenw.org

Telephone: 503-223-4544

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Renewable Northwest is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. The common goal of Renewable Northwest's 49 members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment.

 \boxtimes List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Renewable Northwest is keenly interested in ensuring that renewable avoided cost rates send accurate market signals to parties looking to develop QFs in Oregon. PacifiCorp's efforts to capture recent changes in federal and state law in its avoided cost filings could directly impact renewable QF development in the company's territory. Renewable Northwest has QF developer members who are active in Oregon. Therefore, we have a direct and substantial interest in this proceeding. No other party can adequately represent Renewable Northwest's interest in this proceeding.

5. The issues the Petitioner intends to raise at the proceeding are:

Renewable Northwest intends to participate as a party and raise issues that are appropriate to the proceeding.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Renewable Northwest has a long history of participating in regulatory proceedings related to the development and integration of renewable energy projects, including renewable QFs under PURPA. Of particular relevance to this proceeding, Renewable Northwest submitted comments and testified about PacifiCorp's March 1, 2016 filing in front of the Commission. Additionally, Renewable Northwest was one of the principal proponents of SB 1547. The changes to Oregon's Renewable Portfolio Standard and Renewable Energy Credit banking structure in SB 1547 led the Commission to reject PacifiCorp's March 1, 2016 filing. 7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Northwest respectfully requests that the Commission grants this Petition to Intervene. Renewable Northwest's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Silvia Tanner Staff Counsel Renewable Northwest silvia@renewablenw.org 503-223-4544

03/31/2016 Date Signed

Exhibit A Renewable Northwest Members (March 2015)

3Degrees American Wind Energy Assoc. Atkins Bonneville Environmental Foundation Center for Energy Efficiency & Renewable Technologies Citizens' Utility Board **Climate Solutions** Columbia Gorge Community College Community Renewable Energy Association DNV GL EDF Renewable Energy EDP Renewables North America LLC **Environment Oregon Environment Washington** Eurus Energy America EverPower **GE Energy** Geothermal Resources Council Green Mountain Energy Company HDR Engineering, Inc. Iberdrola Renewables Idaho Conservation League Invenergy K&L Gates Kapla Law PLLC MAP Montana Environmental Information Center **MontPIRG** Natural Resources Defense Council NextEra Energy Resources Northwest Environmental Business Council Northwest SEED NW Energy Coalition **OneEnergy Renewables** Oregon Solar Energy Industries Association Oregon Tech Orion Renewable Energy Group LLC **OSPIRG** Principle Power **REC Silicon** RES America Developments, Inc.

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