

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1734

In the Matter of

PACIFICORP, dba PACIFIC POWER,
Application to Reduce the Qualifying
Facility Contract Term and Lower the
Qualifying Facility Standard Contract
Eligibility Cap

PETITION TO INTERVENE

Sierra Club 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: Travis Ritchie
Company: Sierra Club
Street Address: 85 Second St., 2nd Fl.
City, State, Zip: San Francisco, CA 94105
Email Address: travis.ritchie@sierraclub.org
Telephone: 415-977-5727

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Same as above (pro hac vice pending)
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

Name: Gloria Smith (pro hac vice pending)
Company: Sierra Club
Street Address: 85 Second St., 2nd Fl.
City, State, Zip: San Francisco, CA 94105
Email Address: gloria.smith@sierraclub.org
Telephone: 415-977-5532

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

Name: Alexa Zimbalist
Company: Sierra Club
Street Address: 85 Second St., 2nd Fl.
City, State, Zip: San Francisco, CA
Email Address: alexa.zimbalist@sierraclub.org
Telephone: 415-977-5649

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

Sierra Club, founded in 1892, is the nation's oldest non-profit, grass-roots environmental organization. The Oregon Chapter of the Sierra Club is a non-profit member-supported, public interest organization that promotes conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 15,000 members in the state. Sierra Club's 1.3 million members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. The Sierra Club's most important current priority is to advance smart, clean energy solutions that address the critical problems of global warming, air pollution, and our nation's dependence on fossil fuels.

List of Members attached

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

Sierra Club has a substantial interest in this docket. Its members seek to advance energy development and resource procurement policies in Oregon that recognize the benefits of appropriately-sited, low-emission electricity generating resources for Oregon's economy and the health and well being of its citizens and natural environment. Sierra Club is concerned that PacifiCorp's proposed change to PURPA contract terms would create a substantial barrier to further renewable energy development in Oregon. Petitioner's members in Oregon seek to promote clean energy alternatives to fossil fuels, such as wind, solar, and geothermal energy, so as to protect public health and Oregon's unique ecosystems.

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

Sierra Club intends to review PacifiCorp's proposal to reduce the standard terms for PURPA contracts in Oregon and investigate whether and to what extent such action may impede future renewable energy development in Oregon and/or impose unnecessary costs on ratepayers.

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

Sierra Club has special expertise in the realm of environmental regulatory compliance and the viability of responsible deployment of clean energy alternatives. With staff and volunteers in PacifiCorp's multi-state territory, Sierra Club can provide knowledge and experience regarding viable energy solutions for clean air and clean water in the region. Additionally, Sierra Club has experience intervening in similar dockets before other public utility commissions, including PacifiCorp's application to reduce the term of PURPA contracts in Idaho (Case No. PAC-E-15-03) and Utah (Docket 15-035-53).

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Travis Ritchie
Petitioner or Petitioner's Representative

September 3, 2015
Date Signed

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2015, I caused to be served the foregoing PETITION TO INTERVENE in Docket UM 1734 upon all party representatives on the official service list for this proceeding via electronic mail.

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Dated this 3rd day of September, 2015 at San Francisco, CA.

/s/ Alexa Zimbalist

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