## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 1854

In the Matter of	)
	) PETITION TO INTERVENE OF
PORTLAND GENERAL ELECTRIC	) HEELSTONE DEVELOPMENT, LLC
COMPANY,	)
	)
Application to Lower Standard Price and	)
Contract Eligibility Cap for Solar	)
Qualifying Facilities	)

Pursuant to ORS § 756.525 and OAR § 860-001-0300, Heelstone Development,

LLC ("Heelstone") petitions the Public Utility Commission of Oregon ("Commission")

to intervene with full party status. Heelstone waives paper service of all non-confidential

filings. In support of this petition, Heelstone provides the following information:

1. The names and addresses of Heelstone Intervenors are:

Jennifer L. Kerrigan	Katie T. Heath
Vice President and Corporate Counsel	Vice President of Business Development
101 N. Chestnut St., Suite 113	101 N. Chestnut St., Suite 113
Winston-Salem, NC 27101	Winston-Salem, NC 27101
legal@heelstoneenergy.com	ktheath@heelstoneenergy.com
Phone No.: (336) 842-8316	Phone No.: (336) 842-8317

2. The name and address of the attorney representing Heelstone 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: rlorenz@cablehuston.com

3. Heelstone is a Delaware limited liability company that is in the business of

developing renewable solar photovoltaic generating facilities.

4. On June 30, 2017, PGE filed an Application to Lower the Standard Price and Standard Contract Price Eligibility Cap for Solar Qualifying Facilities ("QF"). PGE's application, if granted, would substantially curtail the rights of renewable power developers in Oregon. The outcome of this proceeding may have a direct and significant impact on Heelstone's business activities.

5. Heelstone's interest in this proceeding is not adequately represented by any other party. Heelstone's participation in this proceeding will not unreasonably broaden the issues, burden the record or delay this proceeding.

6. It is in the public interest to allow Heelstone to intervene in this proceeding.

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

DATED this 25<sup>th</sup> day of July, 2017.

/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 Heelstone Development, LLC