BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1854

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	RENEWABLE ENERGY
COMPANY)	COALITION'S
)	PETITION TO INTERVENE
Application to Lower the Standard Price and)	
Standard Contract Eligibility Cap for Solar)	
Qualifying Facilities)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy

Coalition ("Coalition") petitions the Oregon Public Utility Commission (the

"Commission") to intervene and appear with full party status. In support of this petition

to intervene, Coalition provides the following information:

The name and address of Coalition is:

Renewable Energy Coalition Attn: John Lowe PO Box 25576 Portland, OR 97298 Telephone: (503) 717- 5375 E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent Coalition in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

John Lowe Renewable Energy Coalition PO Box 25576 Portland, OR 97298 Telephone: (503) 717- 5375 Fax: (503) 717- 5092 jravenesanmarcos@yahoo.com Irion Sanger Sanger Law, PC 1117 SE 53rd Avenue Portland, OR 97215 Telephone: (503) 756-7533 Fax: (503) 334-2235 irion@sanger-law.com

Coalition is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of Coalition is to represent the interests of independent power producers and marketers in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

PGE's application could have a substantial impact on REC's members. PGE has requested that the Commission lower the standard contract eligibility cap, and impose a permanent cap on eligibility for standard contracts and rates for any one owner. PGE's proposals could result in a significant change in the Commission's implementation of the Pubic Utility Regulatory Policies Act ("PURPA") for both PGE and other Oregon investor owned utilities, and can harm both independent power producers and ratepayers

Coalition has participated in numerous regulatory proceedings intended to promote competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. Coalition's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, Coalition's interest is not adequately represented by any other party in this proceeding. WHEREFORE, Coalition respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 11th day of July 2017.

Respectfully submitted,

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Attorney for the Renewable Energy Coalition