## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

## **UM 1854**

In the Matter of  PORTLAND GENERAL ELECTRIC COMPANY,		PETITION TO INTERVENE OF RENEWABLE NORTHWEST
Application to Lower the Standard Price and Standard Contract Eligibility Cap for Solar Qualifying Facilities.		
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: Company: Street Address: City, State, Zip: Email Address: Telephone:	Silvia Tanner Renewable Northwest 421 SW 6 <sup>th</sup> Avenue, Suite 975 Portland, OR 97204 silvia@renewablenw.org 503-223-4544	
□ 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 listed under #1, above.		
2b. Additional contacts to on the service list):	o be included on the	e service list (a petitioner is limited to three contacts
Name: Company: Street Address:	Renewable NW Do Renewable Northw 421 SW 6 <sup>th</sup> Avenu	vest

Portland, OR 97204

503-223-4544

dockets@renewablenw.org

City, State, Zip:

Email Address:

Telephone:

Name: Dina Dubson Kelley Company: Renewable Northwest

Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 975

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. Renewable Northwest has 54 member organizations that include renewable energy developers and manufacturers, as well as consumer advocates, environmental groups, academic institutions, and other industry advisers. The common goal of Renewable Northwest's members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment.

☐ List of Members attached

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

Renewable Northwest is interested in proceedings that can affect the landscape for renewable development in the region, like those related to the implementation of the Public Utility Regulatory Policies Act of 1978 ("PURPA"). Portland General Electric's application could affect the development of solar Qualifying Facilities ("QFs") in the company's service territory because it could substantially impact this Commission's implementation of PURPA with respect to solar QFs. 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 is a party to UM 1610, and was a party to UM 1734 and UM 1725.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable Northwest respectfully requests that the Commission grant this Petition to Intervene. It is in the public interest to allow Renewable Northwest to intervene in this proceeding. Moreover, 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.

Respectfully submitted this 10<sup>th</sup> day of July, 2017.

/s/ Silvia Tanner
Silvia Tanner
Staff Counsel
silvia@renewableNW.org

## Exhibit A

## Renewable Northwest Members (July 2017)

3Degrees

7Skyline, LLC

174 Power Global

American Wind Energy Association

**Avangrid Renewables** 

Bonneville Environmental Foundation

Center for Energy Efficiency & Renewable

Technologies

Citizens' Utility Board of Oregon

Climate Solutions

Columbia Gorge Community College

Community Renewable Energy Association

Cypress Creek Renewables

Davis Wright Tremaine

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.

Idaho Conservation League

Invenergy

K&L Gates

Kapla Law PLLC

Latitude45 Associates

MAP

Montana Environmental Information Center

MontPIRG

National Grid

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

Scout Clean Energy

Sempra Renewables

Solar Oregon

Stoel Rives, LLP

SunPower Corporation

**SWCA** Environmental Consultants

Vestas Americas

Warm Springs Power & Water Enterprises

Washington Environmental Council

WashPIRG

Western Resource Advocates