

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1987

In the Matter of)	
)	PETITION TO INTERVENE OF
PORTLAND GENERAL ELECTRIC)	COMMUNITY RENEWABLE ENERGY
)	ASSOCIATION, NORTHWEST AND
PGE Request to Update Schedule 201 and)	INTERMOUNTAIN POWER
<u>Standard Power Purchase Agreements</u>)	PRODUCERS COALITION, AND
)	RENEWABLE ENERGY COALITION

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Community Renewable Energy Association (“CREA”), Northwest and Intermountain Power Producers Coalition (“NIPPC”), and 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, CREA, NIPPC, and Coalition provide the following information:

The name and address of CREA is:

Community Renewable Energy Association
Attn: Brian Skeahan
1113 Kelly Ave
Dalles, OR 97058
Email: Brian.skeahan@yahoo.com

The name and address of NIPPC is:

Northwest and Intermountain Power Producers Coalition
Attn: Robert D. Kahn
Executive Director
P.O. Box 504
Mercer Island, Washington 98040
Telephone: (206) 236-7200
Email: rkahn@nippc.org

The name and address of Coalition is:

Renewable Energy Coalition
Attn: John Lowe
88644 Hwy. 101
Gearhart, OR 97138
Telephone: (503) 717- 5375
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC and Richardson Adams, PLLC will represent CREA, NIPPC and the 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
88644 Hwy. 101
Gearhart, OR 97138
Telephone: (503) 717- 5375
Fax: (503) 717- 5092
jravenesanmarcos@yahoo.com

Brian Skeahan
Community Renewable Energy
Association
1113 Kelly Ave
Dalles, OR 97058
Brian.skeahan@yahoo.com

Robert D. Kahn
Northwest and Intermountain
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P.O. Box 504
Mercer Island, Washington 98040
Telephone: (206) 236-7200
Email: rkahn@nippc.org

Irion Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

Greg Adams
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: 208.938.2236
Fax: 208.938.7904
Greg@richardsonadams.com

Mark Thompson
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (503) 706-0434
Fax: (503) 334-2235
mark@sanger-law.com

Marie Barlow
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
marie@sanger-law.com

CREA was established in 2007 and is an intergovernmental association. See ORS 190.003-190.118. CREA consists of local governments seeking to promote locally-owned renewable energy projects for all forms of renewable generation recognized in Oregon’s Renewable Portfolio Standard (biomass, geothermal, hydropower, ocean thermal, solar, tidal, wave, wind and hydrogen). CREA is comprised of several Oregon counties which provide active participation through their county commissioners, including Sherman, Wasco, Gilliam, Harney, Hood River, Morrow, Polk, Union, Wheeler, Curry, and Wallowa. In addition to these counties, CREA’s current membership includes the Mid-Columbia Council of Governments, Columbia Gorge Community College, and 25 irrigation districts, businesses, individuals and non-profit organizations who have interest in a viable community renewable energy sector for Oregon.

NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.¹ The purpose of NIPPC is to represent the interests of its members in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

Coalition was established in 2009, and is comprised of nearly forty members who own and operate over fifty qualifying facilities (“QFs”) and who are also attempting to develop new projects (“QFs”) in Oregon, Idaho, Washington, Utah, Montana and Wyoming. Most of Coalitions members are existing projects that have operating and

¹ NIPPC’s members include: Calpine, Capital Power, Constellation Energy, Cypress Creek Renewables, Direct Energy, EcoPlexus, EDF Renewables, EDP Renewables, Invenergy, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power, Shell Energy North America, Sierra Pacific Industries, TLS Capital, and TransAlta Energy Marketing.

selling to utilities for numerous years; however, many Coalition members are attempting to construct new renewable energy projects.

PGE's request to update Schedule 201 and standard power purchase agreements will impact the ability of independent power producers to sell their power to PGE under the Public Utility Regulatory Policies Act ("PURPA"). CREA, NIPPC and the Coalition's members include QFs that have (or intend to have) power purchase agreements ("PPAs") with Oregon utilities with rates based on its avoided costs. Their members also sell power to Portland General Electric, Idaho Power and PacifiCorp in Oregon, Idaho, Montana, Washington, Wyoming, and/or Utah. In addition, PURPA is the only federal statute that promotes competition in the electric generation sector, and its successful implementation helps promote wholesale competitive electric markets. Without participation, CREA, NIPPC and REC would not have the ability to participate in the proceeding, which could result in material harm to their members.

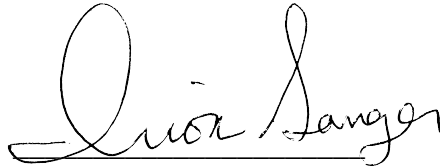
CREA, NIPPC and the Coalition have participated in numerous regulatory proceedings intended to promote competitive markets, PURPA, renewable energy, and diversity of generation ownership, including the recent major proceedings regarding QF contract and rate eligibility. Their intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, their interest is not adequately represented by any other party in this proceeding.

WHEREFORE, CREA, NIPPC and REC 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 21th day of December 2018.

Respectfully submitted,



Irion Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (503)756-7533
Fax: (503)334-2235
irion@sanger-law.com



Gregory M. Adams (ISB No. 7454)
Richardson Adams, PLLC
515 N. 27th Street
Boise, ID 83702
Telephone: 208.938.2236
Fax: 208.938.7904
greg@richardsonadams.com

Attorney for the Community Renewable Energy
Association, Northwest and Intermountain Power
Producers Coalition, and Renewable Energy
Coalition