

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2000

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	RENEWABLE ENERGY
OREGON,)	COALITION'S
)	PETITION TO INTERVENE
<u>Investigation Into PURPA Implementation</u>)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (the "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 Thompson, 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 Thompson, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

Marie Phillips Barlow
Sanger Thompson, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 420-7734
Fax: (503) 334-2235
marie@sanger-law.com

The Coalition was established in 2009, and is comprised of nearly forty members who own and operate over fifty qualifying facilities or are attempting to develop new projects (“QFs”) in Oregon, Idaho, Washington, Utah, Montana and Wyoming. The Commission’s investigation into PURPA implementation will directly impact the ability, rates, terms, and conditions of any power sales to Oregon electric utilities.

The 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. The 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, the Coalition’s interest is not adequately represented by any other party in this proceeding.

WHEREFORE, the 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 7th day of June 2019.

Respectfully submitted,



Irion Sanger
Sanger Thompson, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503)756-7533
Fax: (503)334-2235
irion@sanger-law.com

Of Attorneys for the Renewable Energy Coalition