

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 63

In the Matter of)
)
IDAHO POWER COMPANY,) RENEWABLE ENERGY COALITION
) PETITION TO INTERVENE
)
2015 Integrated Resource Plan.)
)
)
)
_____)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“REC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, REC provides the following information:

The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

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

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REC is comprised of over fifty members that are small qualifying facilities (“QFs”) who own and operate nearly forty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts.

Idaho Power’s 2015 integrated resource plan (“IRP”) could have a direct and substantial impact on REC’s members. The IRP represents Idaho Power’s commitment to develop a long-term resource plan that considers cost, risk, uncertainty, and the long-run public interest. The IRP will form the foundation for Idaho Power’s future generation, demand side management, and transmission investments.

The IRP will impact Idaho Power’s retail rates as well as its avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). REC’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with Oregon utilities with rates based on its avoided costs. REC’s members also sell power to Idaho Power and PacifiCorp in Idaho, Washington, Wyoming, and/or Utah. Most of REC’s members are existing projects that have operating and selling to utilities for numerous years. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and

Oregon. REC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities. REC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, 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 otherwise fully participate in the proceedings.

Dated this 14th day of September 2015.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned above the typed name and contact information.

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Of Attorneys for the Renewable Energy Coalition