

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 66

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|-------------------------------|---|------------------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC |) | RENEWABLE ENERGY COALITION'S |
| COMPANY, |) | PETITION TO INTERVENE |
| |) | |
| 2016 Integrated Resource Plan |) | |
| _____ |) | |

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, the Coalition provides the following information:

The name and address of the Coalition is:

Renewable Energy Coalition
Attn: John Lowe
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Portland, OR 97298
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent the Coalition 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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The Coalition was established in 2009, and is comprised of over thirty members that are both small and large qualifying facilities (“QFs”) who own and operate approximately fifty renewable energy generation facilities in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts, but the membership includes biomass, solar, geothermal, and waste energy. Most of the Coalition’s members operate existing projects that have been operating and selling to Oregon utilities for numerous years, but many of the members are developing or planning to develop new projects.

Portland General Electric Company’s 2016 integrated resource plan (“IRP”) could have a direct and substantial impact on the Coalition’s members. The IRP establishes PGE’s commitment to develop a resource plan that considers cost, risk, uncertainty, and the long-run public interest. The IRP will form the foundation for PGE’s resource acquisition strategy, which directly impacts PGE’s avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). The Coalition’s

members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with PGE with rates based on PGE’s avoided costs. Therefore, this proceeding could impact the avoided cost rates paid to, and electric power rates paid by Coalition members. Without intervention, the Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

The Coalition was monitoring the proceeding, but did not seek intervention earlier in the proceeding, or submit comments, because it believed that its interests were being adequately addressed by other parties, and it understood that the scope of the proceeding would address traditional IRP related issues. For example, Renewable Northwest and the Northwest and Intermountain Power Producers Coalition were already adequately addressing the issue of PGE’s renewable resource need.

The Commission Staff in its final staff report and recommendation, however, has recommended a wholesale revision of avoided cost pricing without notice to stakeholders. Specifically, the Commission Staff has recommended that the Commission depart from its long-standing approach of setting renewable avoided cost rates based on the utility’s next planned renewable resource acquisition, to setting it based on a new and undefined renewable resource date that is “that is commensurate with least cost and least risk.” It is not appropriate to make a fundamental methodological change in avoided cost pricing in an IRP at all, let alone the last stage of an IRP, and without providing sufficient opportunity to review and comment.

The Coalition has participated in numerous regulatory proceedings related to renewable energy, QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and Oregon. The Coalition’s attorney has participated in

numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities. The Coalition's intervention will assist the Commission in resolving these newly-raised issues and will not unreasonably broaden the scope, burden the record, or delay this proceeding.

The Coalition respectfully requests that the Commission grant its petition to intervene with full 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 4th day of August, 2017.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

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Of Attorneys for the Renewable Energy Coalition