

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 67**

In the Matter of )  
PACIFICORP, dba PACIFIC POWER’s ) RENEWABLE ENERGY COALITION’S  
2017 Integrated Resource Plan. ) PETITION TO INTERVENE  
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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  
PO Box 25576  
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:

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

John Lowe  
Renewable Energy Coalition  
PO Box 25576  
Portland, OR 97298  
Telephone: 503-717-5375  
Fax: 503-717-5092  
jravenesanmarcos@yahoo.com

Nancy Esteb  
P.O. Box 490  
Carlsborg, WA 98324  
Telephone: 360-681-8490  
esteb44@centurylink.net

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.

PacifiCorp’s 2017 integrated resource plan (“IRP”) could have a direct and substantial impact on the Coalition’s members. The IRP establishes PacifiCorp’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 PacifiCorp’s resource acquisition strategy, which directly impacts PacifiCorp’s avoided cost rates for

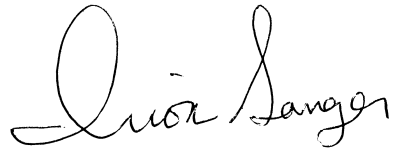
QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). The Coalition’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with PacifiCorp with rates based on PacifiCorp’s avoided costs. Therefore, this proceeding could impact the avoided cost rates paid to, and electric power rates paid by Coalition members. Without participation, the Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

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 the issues and will not unreasonably broaden the issues, burden the record, or delay 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 otherwise fully participate in the proceedings.

Dated this 27th day of April, 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".

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

Of Attorneys for the Renewable Energy Coalition