

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 70**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	RENEWABLE ENERGY
	)	COALITION'S
2019 Integrated Resource Plan	)	PETITION TO INTERVENE
_____	)	

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, 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 Law, 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:

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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.

PacifiCorp’s 2019 integrated resource plan (“IRP”) could have a direct and substantial impact on Coalition’s members. The IRP represents 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 future generation, demand side management, and transmission investments.

The IRP will impact PacifiCorp’s retail rates as well as its avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). Coalition’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with Oregon utilities with rates based on its avoided costs. Most of Coalitions members are existing projects that have operating and selling to utilities for numerous years; however, many Coalition members are attempting to construct new renewable energy projects. Without participation, Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.


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

WHEREFORE, 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 17th day of September 2018.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned above a horizontal line.

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