

Coronal Development Services
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CDS is a national solar energy services provider and project development firm. CDS is the result of the February 2015 acquisition of HelioSage Energy by the alternative energy development business Coronal Group (d.b.a. Coronal-Panasonic). At the time of its acquisition by Coronal Group, HelioSage was among the nation's fastest growing independent solar development firms, with a contracted pipeline of over 400 megawatts of executed power purchase agreements ("PPAs") in the past two years with utilities, including Georgia Power, Gulf Power (Florida), Duke Energy Progress (North Carolina), Idaho Power Company (Oregon), Pacific Power (Oregon), and the Tennessee Valley Authority. The entirety of the HelioSage team and project pipeline now resides within CDS.

The outcome of this investigation into Oregon's implementation of the Public Utility Regulatory Policies Act ("PURPA") could have a substantial impact on CDS. CDS's PPAs with Idaho Power Company and Pacific Power are PURPA contracts. The testimony of some parties in this case has referenced and discussed the PPAs that CDS has with Pacific Power. These PPAs are located in what the company has called a "load pocket," and have contract provisions regarding the payment of the costs of third party transmission. CDS is also interested in further resource development in Oregon, and the outcome of nearly all issues in this proceeding could impact the implementation of their

current PPAs and projects, and/or the ability of CDS to enter into future PPAs and projects.

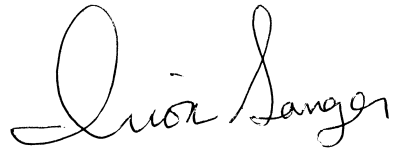
CDS has a legal right to intervene in this proceeding. Under Oregon law, a party has the right to intervene in a proceeding if the application “is made before the final taking of evidence in the proceeding.” ORS § 756.525. CDS’s application is being submitted before the filing of reply testimony and the evidentiary hearing, which is well before the “final taking of evidence in the proceeding.”

CDS’s intervention will also assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. CDS’s attorney has participated in numerous Commission proceedings and investigations regarding Oregon’s investor owned electric utilities, including PURPA proceedings. CDS will not unreasonably broaden the issues and only intends to address topics on the official issues list. Due to fact that the existing schedule does not contemplate additional rounds of testimony, CDS does not intend to submit written or oral testimony at this time. Instead of submitting testimony, CDS intends to rely upon the existing testimony submitted by other parties, and participate in all the remaining events on the procedural schedule. CDS will not burden the record or seek any delay in the proceeding due to the filing of this petition to intervene at this stage of the proceeding.

WHEREFORE, CDS 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 (subject to the limitations in the current procedural schedule).

Dated this 7th day of August 2015.

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 Coronal Development
Services