



April 30, 2015

Oregon Public Utilities Commission  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
PO Box 1088  
Salem, OR 97308

**RE: UM 1716 Investigation to Determine Resource Value of Solar**

Attention Filing Center,

Please find enclosed for filing the *Petition to Intervene of the Interstate Renewable Energy Council, Inc.*, and the accompanying *Certificate of Service*, to be electronically filed, April 30, 2015, with the Oregon Public Utilities Commission.

Please contact me if you have any questions regarding this filing.

Sincerely,

/s/ Kimberly L. Kooles

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1716

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation to Determine the Resource  
Value of Solar.

PETITION TO INTERVENE OF  
THE INTERSTATE RENEWABLE  
ENERGY COUNCIL

The Interstate Renewable Energy Council, Inc. (IREC) petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the Petitioner is:

Company: The Interstate Renewable Energy Council, Inc.  
Street Address: P.O. Box 1156  
City, State, Zip: Latham, NY 12110-1156  
Email Address: sarab@irecusa.org  
Telephone: (518) 621-7379

Please do not include this contact on the service list.

- 2a. The Petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Jason Keyes  
Company: Keyes, Fox & Wiedman LLP  
Street Address: 436 14<sup>th</sup> Street, Suite 1305  
City, State, Zip: Oakland, CA 94612  
Email Address: jkeyes@kfwlaw.com  
Telephone: (206) 919-4960

Petitioner's counsel waives paper service.

- 2b. Additional contacts to be included on the service list: None

3. If the Petitioner is an organization, the number of members in and the purpose of the organization:

The Interstate Renewable Energy Council, Inc. (IREC) is a non-profit organization within the meaning of Section 501(c)(3) of the United States Internal Revenue Code. It is not a member-based organization. As a nonprofit organization, IREC works to expand retail electric customer access to renewable energy resources through the development of programs and policies that reduce barriers to renewable energy deployment and increase consumer access to renewable technologies.

4. The nature and extent of the Petitioner's interest in the proceeding is:

IREC works to implement successful regulatory policies and programs that expanded residential customer access to solar and other distributed renewable energy technologies. IREC's interest in this proceeding lies in ensuring that a standard and equitable valuation methodology for distributed solar resources in Oregon is established.

5. The issues the Petitioner intends to raise at the proceeding are:

IREC intends to actively participate in this proceeding and offer comments on equitable valuation methodology for distributed solar resources as necessary.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

IREC focuses on policies that directly impact these customers' access to renewable technologies, including net metering rules, interconnection procedures, value of solar methodology, renewable energy permitting, and shared renewable energy programs.

Since 2005, IREC has been involved in over 30 state-level net metering and/or solar valuation proceedings.<sup>1</sup> Most recently, IREC participated in proceedings in Arizona, Minnesota, and California, among other states, to address methodological issues involving the valuation of solar and the cost-effectiveness of net metering.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

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<sup>1</sup> These include proceedings in: HI, AK, CA, OR, WA, NV, UT, CO, AZ, NM, TX, SD, MI, IA, ID, IL, IN, OH, PA, NH, VT, ME, DE, MA, CT, NJ, NY, FL, MS, NC, KY, VA, and WV.

DATED this 29<sup>th</sup> day of April, 2015

Respectfully Submitted,

KEYES, FOX & WIEDMAN, LLP  
***For the Interstate Renewable Energy  
Council, Inc.***

/s/ Jason Keyes

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served **The Interstate Renewable Energy Council, Inc.'s Petition to Intervene** upon all parties in UM 1716 by sending a copy via electronic mail at the following addresses.

DATED this 30th day of April 2015.

KEYES, FOX & WIEDMAN LLP

/s/ Kimberly Kooles  
Kimberly Kooles

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