

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of)	CASE NO. UM 1725
)	
IDAHO POWER COMPANY,)	PETITION TO INTERVENE OF THE
)	COMMUNITY RENEWABLE ENERGY
Application to Lower Standard Contract)	ASSOCIATION
Eligibility Cap and to Reduce the)	
Standard Contract Term, for Approval of)	
Solar Integration Change, and for Change)	
<u>in Resource Sufficiency Determination.</u>)	

Pursuant to ORS 756.525 and OAR 860-001-0300, the Community Renewable Energy Association (“CREA”) hereby respectfully petitions the Public Utility Commission or Oregon (“OPUC” or “Commission”) to grant CREA intervenor status in this proceeding. In support of this Petition, CREA states as follows:

1. The name and address of CREA is:

Community Renewable Energy Association
c/o Brian Skeahan
1113 Kelly Ave
Dalles, OR 97058
Email: Brian.skeahan@yahoo.com

2. CREA will be represented in this proceeding by Peter J. Richardson (OSB No. 066687) and Gregory M. Adams (OSB No. 101779), of the law firm Richardson Adams, PLLC.

3. All documents relating to this proceeding should be served on the following persons:

Gregory M. Adams (OSB No. 101779)
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
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4. CREA is an Oregon Rev. Stat. Ch. 190 intergovernmental association. *See* ORS 190.003- 190.118. CREA is a public/private organization whose members consist of individuals, businesses, and local governments seeking to promote locally-owned renewable energy projects for all forms of renewable generation recognized in Oregon’s Renewable Portfolio Standard (“RPS”) (biomass, geothermal, hydropower, ocean thermal, solar, tidal, wave, wind and hydrogen). CREA is comprised of several Oregon counties which provide active participation through their county commissioners, including Sherman, Wasco, Gilliam, Harney, Hood River, Morrow, Polk, Union, Wheeler, Curry, and Wallowa. In addition to these counties, CREA’s current membership includes the Mid-Columbia Council of Governments, Columbia Gorge Community College, and 25 irrigation districts, businesses, individuals and non-profit organizations who have interests in a viable community renewable energy sector for Oregon.

5. In its efforts to establish a viable market in Oregon for community-scale renewable energy projects, CREA has intervened or otherwise actively participated in dockets at the Commission regarding the implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978 (“PURPA”), including OPUC dockets UM 1129, UM 1396, UM 1442, UM 1443, UE 245, UM 1610, and DR 46. CREA has also recently intervened or actively participated in proceedings before the Federal Energy Regulatory Commission (“FERC”) that affect Oregon qualifying facilities (“QFs”), including dockets RM13-2 (regarding small generator interconnection rules) and EL15-6 (*PaTu Wind Farm, LLC v. Portland General Electric Co.*).

6. Because the outcome of this proceeding may affect the rates, terms and conditions available for community renewable energy projects to sell their output to Oregon utilities as QFs, CREA has a direct and substantial interest in this matter.

7. CREA's interest in Oregon avoided cost proceedings has traditionally focused on the rates, terms and conditions available in PacifiCorp and Portland General Electric Company's service territories, and CREA ordinarily does not intervene in Idaho Power Company-specific proceedings. However, PacifiCorp's recently filed request to lower the eligibility cap and shorten QF contract lengths, similar to Idaho Power's application in this docket, raises serious and significant concerns for CREA that necessitate this intervention. CREA, along with several other parties and the Commission's Staff, engaged in protracted and costly proceedings in Phase 1 of docket UM 1610 to address two of the very same issues proposed for the Commission's consideration in this proceeding – the appropriate length of QF contracts and the appropriate level of the eligibility cap for standard rates. Idaho Power and PacifiCorp's recommendations to undermine PURPA on those two issues were not adopted by the Commission in final Order No. 14-058, issued just over a year ago on February 24, 2014. The collateral attack on the Commission's final Order No. 14-058 materially harms CREA. It also threatens to undermine confidence in the finality of the Commission's decisions and advantage well-funded utilities with an unlimited budget to re-litigate these issues until they finally win. CREA is therefore significantly impacted by this proceeding.

8. CREA's participation in this docket will assist the Commission in resolving the issues and will not unreasonably burden the record, delay the proceedings or broaden the issues.

9. Because no other party can adequately represent CREA's interests in this proceeding, CREA respectfully requests that the Commission grant this Petition to Intervene.

RESPECTFULLY SUBMITTED this 27th day of May, 2015.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)

Of Attorneys for the Community Renewable
Energy Association