

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1725

In the Matter of)	
)	
IDAHO POWER COMPANY,)	RENEWABLE ENERGY COALITION
)	PETITION TO INTERVENE
)	
Application to Lower Standard Contract)	
Eligibility Cap and to Reduce the Standard)	
Contract Term, for Approval of Solar)	
Integration Charge, and for Change in)	
Resource Sufficiency Determination.)	
_____)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Renewable Energy Coalition (“REC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, REC provides the following information:

The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent REC 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
12050 SW Tremont Street
Portland, OR 97225
Telephone: 503-372-6901
Fax: 503-372-6902
jravenesanmarcos@yahoo.com

REC was established in 2009, and is comprised of over thirty members that are small qualifying facilities (“QFs”) who own and operate nearly forty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, corporations, and individuals. The majority of the individual QFs are small hydroelectric projects less than 7 megawatts.

Idaho Power Company’s (“Idaho Power”) application could have a substantial impact on REC’s members. Idaho Power has requested that the Commission lower the standard contract eligibility cap, reduce the standard contract term, approve a solar integration charge, and change its resource sufficiency period. Idaho Power’s proposals could result in a significant change in the Commission’s implementation of the Public Utility Regulatory Policies Act (“PURPA”) for both Idaho Power and other Oregon investor owned utilities.

Idaho Power has made a similar request to lower the standard contract eligibility cap and reduce the contract term in Idaho. Avista and PacifiCorp (doing business as Rocky Mountain Power) quickly filed requests for similar relief. The Idaho Public Utilities Commission is now conducting an investigation into all three utilities’ requests, which could result in a major revision in Idaho’s PURPA policies. REC is a party that is fully participating in that proceeding.

REC's members have power purchase agreements ("PPAs") with Oregon investor owned electric utilities with rates based on the utilities' avoided costs. REC's members also sell power to Idaho Power and PacifiCorp in Idaho, Washington, Wyoming, and Utah. Most of REC's members are existing projects that have operating and selling to Oregon utilities for numerous years. In addition, REC's members purchase back up, station service, and other electrical needs from Oregon utilities. This proceeding could impact the avoided cost rates paid to, and electric power rates paid by, REC's members. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and PURPA throughout the Northwest and Oregon. REC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities. REC'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, REC 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 19th day of May 2015.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large initial "I" and a long, sweeping underline.

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