

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1729**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER's	)	RENEWABLE ENERGY COALITION
	)	PETITION TO INTERVENE
Application to Update Schedule 37 Qualifying	)	
Facility Information.	)	
	)	
	)	
	)	
_____	)	

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

PacifiCorp’s application could have a substantial impact on REC’s members. PacifiCorp has proposed a 43% reduction in its renewable avoided cost rates, and a 16% reduction in its baseload rates, on a fifteen-year levelized basis.

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 PacifiCorp in Idaho, Washington, 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 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 18th day of March 2016.

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 Renewable Energy Coalition