

**Renewable Northwest  
Members**

3Degrees  
American Wind Energy Association  
Atkins  
Bonneville Environmental  
Foundation  
Center for Energy Efficiency &  
Renewable Technologies  
Citizens' Utility Board of Oregon  
Climate Solutions  
Columbia Gorge  
Community College  
Community Renewable  
Energy Association  
DNV GL  
EDF Renewable Energy  
EDP Renewables  
Environment Oregon  
Environment Washington  
Eurus Energy America  
EverPower  
FirstWind  
GE Energy  
Geothermal  
Resources Council  
Green Mountain Energy  
HDR Engineering, Inc.  
Iberdrola Renewables  
Idaho Conservation League  
K&L Gates  
Kapla Law PLLC  
MAP  
Montana Environmental  
Information Center  
MontPIRG  
Natural Capital Partners  
Natural Resources  
Defense Council  
NextEra Energy Resources  
Northwest Environmental  
Business Council  
Northwest SEED  
NW Energy Coalition  
OneEnergy Renewables  
Oregon Solar Energy  
Industries Association  
Orion Renewable Energy  
Group LLC  
OSPIRG  
Oregon Tech  
Portland Energy  
Conservation, Inc.  
Principle Power  
REC Silicon  
RES America Developments  
Solar Oregon  
Stoel Rives, LLP  
SunPower Corporation  
SWCA Environmental Consultants  
Tonkon Torp LLP  
Vestas Americas  
Warm Springs Power &  
Water Enterprises  
Washington Environmental Council  
WashPIRG  
Western Resource Advocates

December 23, 2015

421 SW 6TH AVE, Suite 1125  
Portland, OR 97204  
www.RenewableNW.org  
503.223.4544



**Renewable  
Northwest**

***Via Electronic Mail***

Public Utility Commission of Oregon  
Attn: Filing Center  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Re: In the Matter of PUBLIC UTILITY COMMISSION OF  
OREGON, Implementing an Energy Storage Program  
**Docket No. UM 1751**

Dear Filing Center:

Renewable Northwest's Petition to Intervene is enclosed for filing in the  
above-referenced docket.

Thank you for your assistance, and please do not hesitate to contact our  
office if you have any questions.

Sincerely,

/s/ Silvia Tanner  
Silvia Tanner  
Staff Counsel  
Renewable Northwest

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Implementing an Energy Storage Program.

PETITION TO INTERVENE

Renewable Northwest (“Renewable NW”) 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:

Name: Silvia Tanner  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: silvia@renewablenw.org  
Telephone: 503-223-4544

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner’s counsel to be included on the service list is listed under #1, above.

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Renewable NW Dockets  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: dockets@renewablenw.org  
Telephone: 503-223-4544

Name: Cameron Yourkowski  
Company: Renewable Northwest  
Street Address: 421 SW 6<sup>th</sup> Avenue, Suite 1125  
City, State, Zip: Portland, OR 97204  
Email Address: cameron@renewablenw.org  
Telephone: 503-223-4544

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Renewable NW is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. We have 53 members. The common goal of Renewable NW's members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment.

List of Members attached

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

In pursuit of our mission to advocate for the expansion of environmentally renewable energy resources in the Northwest, Renewable NW was involved in the adoption of HB 2193 and is keenly interested in ensuring its successful implementation to promote the development of a cost-effective, reliable, and clean energy system. We are active participants in regional discussions about the integration of renewable energy sources, and have members actively pursuing storage projects in the Northwest. No other party can adequately represent Renewable NW's interest in this proceeding.

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

Renewable NW intends to participate as a party and raise issues that are appropriate to the proceeding.

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

Renewable NW is a regular public interest participant in Commission proceedings. We have expertise, and have been active, in renewable energy integration issues for years. Additionally, we have participated in storage dockets in other states.

7. Based on the information provided above in accordance with the Commission's rules of procedure, Renewable NW respectfully requests that the Commission grants this Petition to Intervene. Renewable NW's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Silvia Tanner  
Staff Counsel, Renewable Northwest  
[silvia@renewablenw.org](mailto:silvia@renewablenw.org)  
503-223-4544

12/23/2015  
Date Signed

**Exhibit A**  
Renewable Northwest Members (December 2015)

3Degrees	REC Silicon
American Wind Energy Assoc.	RES America Developments, Inc.
Atkins	Solar Oregon
Bonneville Environmental Foundation	Stoel Rives, LLP
Center for Energy Efficiency & Renewable Technologies	SunPower Corporation
Citizens' Utility Board	SWCA Environmental Consultants
Climate Solutions	Tonkon Torp LLP
Columbia Gorge Community College	Vestas Americas
Community Renewable Energy Association	Warm Springs Power & Water Enterprises
DNV GL	Washington Environmental Council
EDF Renewable Energy	WashPIRG
EDP Renewables North America LLC	Western Resource Advocates
Environment Oregon	
Environment Washington	
Eurus Energy America	
EverPower	
First Wind	
GE Energy	
Geothermal Resources Council	
Green Mountain Energy Company	
HDR Engineering, Inc.	
Iberdrola Renewables	
Idaho Conservation League	
K&L Gates	
Kapla Law PLLC	
MAP	
Montana Environmental Information Center	
MontPIRG	
Natural Capital Partners	
Natural Resources Defense Council	
NextEra Energy Resources	
Northwest Environmental Business Council	
Northwest SEED	
NW Energy Coalition	
OneEnergy Renewables	
Oregon Solar Energy Industries Association	
Oregon Tech	
Orion Renewable Energy Group LLC	
OSPIRG	
PECI	
Principle Power	