

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PUBLIC UTILITY) COMMISSION OF OREGON, Implementing) Energy Storage Program Guidelines pursuant to) House Bill 2193))))))) _____)	CASE NO. UM 1751 PETITION TO INTERVENE OF THE COMMUNITY RENEWABLE ENERGY ASSOCIATION
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Pursuant to ORS 756.525 and OAR 860-001-0300, the Community Renewable Energy Association (“CREA”) hereby respectfully petitions the Public Utility Commission of 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
Telephone: 208-938-2236
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Brian Skeahan
PMB 409
18160 Cottonwood Rd.
Sun River, Oregon 97707
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4. CREA is an Oregon Rev. Stat. Ch. 190 intergovernmental association. *See* ORS 190.003-190.118. CREA consists of local governments seeking to promote locally-owned renewable energy projects for all forms of renewable generation recognized in Oregon's Renewable Portfolio Standard (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 interest in a viable community renewable energy sector for Oregon.

5. CREA has an interest in development of viable energy storage facilities as a complement to renewable energy projects CREA intends to promote. CREA has an interest in promoting local ownership of energy storage facilities and an interest in ensuring the value of such storage facilities is correctly calculated in Commission proceedings. Thus, CREA has a direct and substantial interest in the Commission's implementation of House Bill 2193.

6. CREA is uniquely positioned to inform the Commission of the types of storage facilities that would support community-based renewable energy facilities and local economic development.

7. 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.

8. 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 30th day of March, 2016.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)
Of Attorneys for the Community Renewable
Energy Association