

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2011**

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	RENEWABLE ENERGY
OREGON,)	COALITION'S
)	PETITION TO INTERVENE
General Capacity Investigation)	
_____)	

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

The name and address of Coalition is:

Renewable Energy Coalition
Attn: John Lowe
PO Box 25576
Portland, OR 97298
Telephone: (503) 717- 5375
E-Mail: jravenesanmarcos@yahoo.com

Sanger Thompson, PC will represent Coalition in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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Coalition was established in 2009, and is comprised of nearly forty members who own and operate over fifty qualifying facilities or are attempting to develop new projects (“QFs”) in Oregon, Idaho, Washington, Utah, Montana and Wyoming.

The Commission’s general capacity investigation will address three central questions, including what is capacity, how is capacity acquired, and how should capacity be valued. It appears that the Commission will include three phases for each question to establish a shared or common framework.

The third phase will focus on establishing an appropriate valuation methodology for capacity by resource characteristics. This could include setting the capacity value provided by QFs and the utility capacity that is avoided by purchasing from QFs. Thus, the docket could have a substantial and material impact on avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). Coalition’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with Oregon utilities with rates based on its avoided costs. Most of Coalitions members are existing projects that have operating and selling to utilities for numerous years; however, many Coalition members are attempting to construct new renewable energy projects. Without participation, Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

Coalition has participated in numerous regulatory proceedings intended to value capacity, promote competitive markets, PURPA, renewable energy, and diversity of

generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. Coalition's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, Coalition's interest is not adequately represented by any other party in this proceeding.

WHEREFORE, Coalition 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 6th day of May 2019.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned above a horizontal line.

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