

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Investigation Into Interconnection Process
And Policies.

PETITION TO INTERVENE OF THE
COMMUNITY RENEWABLE ENERGY
ASSOCIATION

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 Mike McArthur
802 Chenoweth Loop Road
The Dalles, OR 97058
Email: mwm@community-renewables.org

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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Mike McArthur
Community Renewable Energy Association
802 Chenoweth Loop Road
The Dalles, OR 97058
Telephone: 541-980-2089
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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 irrigation districts, businesses, individuals and non-profit organizations who have interest in a viable community renewable energy sector for Oregon, many of whom are actively engaged in developing renewable energy facilities intended to be operated as qualifying facilities (“QFs”) in Oregon.

5. In its efforts to establish a viable market in Oregon for community-scale renewable energy projects, CREA has intervened or otherwise actively participated in numerous dockets at the Commission regarding Oregon’s implementation of the mandatory purchase provisions of the Public Utility Regulatory Policies Act of 1978 (“PURPA”). CREA has also intervened or actively participated in proceedings before the Federal Energy Regulatory Commission (“FERC”) that affect Oregon QFs.

6. Because the outcome of this proceeding may affect the ability for renewable energy projects to interconnect to and sell their output to Oregon utilities as QFs, CREA has a direct and substantial interest in this matter.

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 20th day of May, 2021.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)

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Of Attorneys for the Community Renewable
Energy Association