BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2108

In the Matter of PACIFICORP d/b/a PACIFIC POWER Application for an Order Approving Queue Reform Proposal.	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 Brian Skeahan
PMB 409
18160 Cottonwood
Sunriver, OR 97707
Email: Brian.skeahan@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)   Brian Skeahan
Richardson Adams, PLLC   PMB 409
515 N. 27th Street   18160 Cottonwood
Boise, Idaho 83702   Sunriver, OR 97707
Telephone: 208-938-2236   Telephone: 360-431-5072
Fax: 208-938-7904   brian.skeahan@community-renewables.org
greg@richardsonadams.com

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, many of whom are actively engaged in developing renewable energy facilities intended to be operated as 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 qualifying facilities ("QFs").

6.   Because the outcome of this proceeding may affect the ability for community 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. CREA has been an active participant in this proceeding through the public hearing process. Although the Commission has not yet issued a contested case notice in this proceeding or granted any party intervenor status in this proceeding, CREA makes this request to ensure that it is granted intervenor status at such time as the Commission may rule on petitions to intervene.

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 12th day of October 2020.

RICHARDSON ADAMS, PLLC

/s/ *Gregory M. Adams*
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Of Attorneys for the Community Renewable
Energy Association