

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2210

In the Matter of

IDAHO POWER COMPANY

Application for Waiver of Competitive
Bidding Rules

RENEWABLE ENERGY
COALITION'S PETITION TO
INTERVENE

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

The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
PO Box 25576
Portland, OR 97298
Telephone: (503) 997-3033
Email: jravensanmarcos@yahoo.com

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

The Coalition has a substantial interest in this proceeding because Idaho Power Company’s (“Idaho Power’s”) proposal may impact Idaho Power’s avoided cost prices set under the Public Utility Regulatory Policies Act (“PURPA”) and the ability for the Coalition’s members to sell power to Idaho Power in its request for proposal. Idaho Power’s proposal is relevant to the Commission’s generic capacity investigation, and Idaho Power’s positions in that proceeding.

The Coalition has participated in numerous regulatory proceedings intended to promote appropriate interconnection procedures, competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. The 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, the Coalition’s interest is not adequately represented by any other party in this proceeding.

WHEREFORE, the 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 17th day of January 2022.

Respectfully submitted,

/s/ Ellie Hardwick
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Of Attorneys for the Renewable Energy Coalition