

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

SANDY RIVER SOLAR, LLC)	CASE NO. UM 1967
Complainant,)	
)	
vs.)	PETITION TO INTERVENE OF THE
)	RENEWABLE ENERGY COALITION
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY)	
Defendant.)	

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 grant REC intervenor status in this proceeding.

In support of this petition to intervene, REC states as follows:

1. The name and address of REC is:

Renewable Energy Coalition
Attn: John Lowe
PO Box 25576
Portland, OR 97298
E-Mail: jravenesanmarcos@yahoo.com

2. REC will be represented in this proceeding by Gregory M. Adams (OSB No. 101779) of the law firm Richardson Adams, PLLC.

3. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Gregory M. Adams (OSB Bo 101779)
Richardson Adams, PLLC
515 N. 27th Street, 83702
P.O. Box 7218, 83707
Telephone: 209-938.2236
Fax: 208-938-7904
greg@richardsonadams.com

John Lowe
Renewable Energy Coalition
PO Box 25576
Portland, OR 97298
Telephone: 503-372-6909
Fax: 503-372-6908
jravenesanmarcos@yahoo.com

4. REC was established in 2009, and is comprised of about forty members that are small qualifying facilities (“QFs”) who own and operate about fifty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. Several types of entities are members of REC, including irrigation districts, water districts, special service districts, corporations, and individuals.

5. Sandy River Solar’s filing could have a substantial impact on REC’s members. Sandy River Solar is seeking two forms of relief from the Commission and asks that the Commission require PGE to: 1) provide complete interconnection studies that would allow Sandy River Solar or a third-party consultant to understand and properly evaluate the need, types and cost of any required interconnection upgrades; and 2) allow Sandy River Solar, subject to PGE’s reasonable oversight, to hire qualified and experienced third-party consultants to properly and safely construct the required interconnection upgrades.

6. REC’s members have power purchase agreements (“PPAs”) and seek to interconnection with Oregon investor owned electric utilities. REC’s members also sell power to PGE in Idaho, Washington, Wyoming, and Utah. Most of REC’s members are existing projects that have operating and selling to Oregon utilities for numerous years. In addition, REC’s members purchase back up, station service, and other electrical needs from utilities. This proceeding could impact the interconnection costs and options available to REC’s members. Without participation, REC would not have the ability to participate in the proceeding, which could result in material harm to its members.

7. REC’s members have generally have the option to hire qualified and experienced third-party consultants to properly and safely construct the required

interconnection upgrades in Oregon and other states. REC also participated in the Oregon rulemaking (AR 521) and generic investigation (UM 1401) that provides Oregon generators the right to hire third-party consultants. REC is surprised that PGE is refusing to allow Sandy River Solar to retain qualified consultants, and intends to align itself with Sandy River Solar.

8. REC has participated in numerous regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, PGE, and PURPA throughout the Northwest and Oregon. REC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned electric utilities.

9. REC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. REC understands that a procedural schedule has been adopted and discovery is ongoing. REC will accept the procedural schedule as is, and participate according to its terms. As REC aligns itself with Sandy River Solar, REC intends to submit testimony on February 7, 2019.

10. Because no other party adequately represents REC's interests in this proceeding, REC respectfully requests that the Commission grant this 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.

RESPECTFULLY SUBMITTED on January 29, 2019.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)

515 N. 27th Street

Boise, Idaho 83702

Telephone: 208-938-2236

Fax: 208-938-7904

greg@richardsonadams.com

Of Attorneys for the Community
Renewable Energy Association