BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

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|---|---|-----------------------|
| In the Matter of |) | |
| |) | RENEWABLE ENERGY |
| PUBLIC UTILITY COMMISSION OF |) | COALITION'S |
| OREGON, |) | PETITION TO INTERVENE |
| |) | |
| Investigation Into PURPA Implementation |) | |

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, 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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The 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 investigation into PURPA implementation will directly impact the ability,

rates, terms, and conditions of any power sales to Oregon electric utilities.

The Coalition has participated in numerous regulatory proceedings intended to

promote 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 7th day of June 2019.

Respectfully submitted,

Irion Sanger

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Of Attorneys for the Renewable Energy Coalition