

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2011**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

General Capacity Investigation

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, Coalition provides the following information:

The name and address of Coalition is:

Renewable Energy Coalition  
Attn: John Lowe  
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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 (“QFs”) or are attempting to develop new projects in Oregon, Idaho, Washington, Utah, Montana and Wyoming. The Coalition’s mission is to represent its members’ interests in sound implementation of the Public Utility Regulatory Policies Act (“PURPA”) and all aspects of utility regulation that impact PURPA.

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. Docket No. UM 2011 will investigate the meaning of the term “capacity,” how capacity is acquired, and how capacity should be valued.<sup>1</sup> Regardless of how each of these questions is answered, the decisions in this docket will have implications for the Coalitions members to the extent the decisions impact the price

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<sup>1</sup> *In re Pub. Util. Comm’n of Oregon General Capacity Investigation*, Docket No. UM 2011, Order No. 19-155, Appendix A at 2.

utilities pay to QFs and the terms of those purchases. The Coalition intends to advocate for sound decision-making on these topics that reflect market realities and that do not unduly favor utilities. 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 brings expertise and a unique perspective from the QFs, which 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 16th day of July 2019.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition