

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Interconnection Process
And Policies

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 the Coalition is:

Renewable Energy Coalition
Attn: John Lowe
PO Box 25576
Portland, OR 97298
Telephone: (503) 717- 5375
E-Mail: jravenesanmarcos@yahoo.com

Sanger Law, PC will represent the 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 QF projects in Oregon, Idaho, Washington, Utah, Montana and Wyoming. The Commission’s investigation into Interconnection Process and Policies will impact many of the Coalition’s Oregon members because they are interconnection customers who purchase goods and services from Oregon utilities.

The Coalition has participated in numerous regulatory proceedings intending to promote, competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings where stakeholders raised issues regarding appropriate interconnection procedures. The Coalition’s executive director, John Lowe, participated in Docket No. AR 521 through which the Commission adopted the current small generator interconnection rules. Since those rules were adopted, the Coalition has monitored their implementation and can provide the Commission with a small QF perspective regarding how well the process is working and what issues QFs

experience. The Coalition has also intervened in other proceedings that addressed interconnection issues, including UM 1930 (community solar), UM 1610 (PURPA policies) and UM 1967 (interconnection customer complaint).

The Coalition also participated in Docket No. UM 2032, where it encouraged the Commission to consider interconnection issues in addition to the network upgrade issues that docket was created to address. The Commission did not address the interconnection issues then, instead choosing to open this separate docket to further investigate interconnection processes and policies. The Coalition petitions to intervene in this investigation so it can address the unresolved issues remaining from Docket No. UM 2032. 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 4th day of August 2020.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition