

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2108

In the Matter of
PACIFICORP, dba PACIFIC POWER,

Application for an Order Approving Queue
Reform Proposal.

DALREED SOLAR, LLC'S
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Dalreed Solar, LLC (“Dalreed Solar”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, Dalreed Solar provides the following information:

The name and address of Dalreed Solar are:

Dalreed Solar, LLC
Attn: Ros Rocco Vrba
PO Box 900083
Sandy, UT 84090-0083
Telephone: (801) 708-2086
E-Mail: rosvrba@energyofutah.com

Sanger Law, PC will represent Dalreed Solar in this proceeding. All documents relating to this proceeding should be served on the following persons at the addresses listed below:

Ros Rocco Vrba
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Dalreed Solar is owned and operated by Energy of Utah, LLC, a renewable energy company primarily focused on renewable energy consulting and the development of clean, renewable energy resources in the Intermountain West region. The Commission's decision to approve PacifiCorp's Queue Reform Proposal with modifications will impact Dalreed Solar, as it is currently trying to interconnect a qualifying facility to an Oregon substation owned by PacifiCorp. More specifically, Dalreed Solar is an Interconnection Customer that must decide whether to participate in the first Cluster Study as part of PacifiCorp's approved Queue Reform.

Dalreed Solar participated in this proceeding prior to the Commission's August 19th Order by submitting comments on August 6th. Since submitting those comments, new and previous concerns have arisen during the newly adopted interconnection process that need resolution. Dalreed Solar'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 Dalreed Solar's interest cannot be adequately represented by any other party in this proceeding.

Dalreed Solar acknowledges that under ORS 756.525, a party is only allowed to apply to appear and participate before the final taking of evidence in proceeding, and it confirms that this petition to intervene complies with that law. Under ORS 756.558 the taking of evidence ends when the Commission declares that the taking of evidence has concluded. The Commission's Order entered on August 19th does not declare that the taking of evidence for Docket Number UM 2108 has concluded. To the contrary, the Order states that the Commission will continue to "monitor and review implementation [of PacifiCorp's Queue Reform Proposal] on an ongoing basis" recognizing that such a

“significant change in interconnection procedure” will result in “issues needing clarification or disputes needing resolution.”¹ The Commission also “preserve[d] for later consideration the possibility of a concurrent serial approach.”² Such statements do not suggest that the taking of evidence has concluded. Because these statements support an ongoing collection of evidence, and because the Commission has not declared that the taking of evidence has concluded, Dalreed Solar’s petition to intervene complies with ORS 756.525.

WHEREFORE, Dalreed Solar 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 14th day of September 2020.

Respectfully submitted,



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Of Attorneys for Dalreed Solar, LLC

¹ Order No. 20-268 at 2.

² *Id.*