

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1734

In the Matter of  
PACIFICORP, dba PACIFIC POWER,  
Application to Reduce the Qualifying  
Facility Contract Term and Lower the  
Qualifying Facility Standard Contract  
Eligibility Cap.

PETITION TO INTERVENE OF CITY OF  
PORTLAND, OREGON

The City of Portland, Oregon petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Andria Jacob  
Company: City of Portland, Oregon  
Bureau of Planning & Sustainability  
1900 SW 4<sup>th</sup> Ave, Room 7100  
City, State, Zip: Portland, OR 97201  
Email Address: andria.jacob@portlandoregon.gov  
Telephone: 503-823-7616

2. The petitioner will be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Benjamin Walters  
Company: City of Portland, Oregon  
Street Address: 1221 SW 4<sup>th</sup> Ave, Room 430  
City, State, Zip: Portland, OR 97204  
Email Address: ben.walters@portlandoregon.gov  
Telephone: 503-823-4047

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The City of Portland is a home rule municipal corporation duly organized and existing under the laws of the State of Oregon. The City of Portland is a large electricity customer with a significant number of accounts and annual utility billings. The City has charter and statutory authority to franchise utilities for orderly management of the streets, and to adopt taxes. As a corporate customer and local government body, the

City strives to balance the goals of economical electricity rates, while maintaining stable general revenue funding to support municipal services.

4. The nature and extent of the Petitioner's interest in the proceeding is:

PacifiCorp has filed an application with the Commission asking to reduce the qualifying facility (QF) contract term from 15 years to three years, as well as to lower the QF standard eligibility cap for standard QF pricing and power purchase agreements (PPAs) from 10 megawatts (MW) to 100 kilowatts (kW). Approval of the application could potentially affect the City's ability to achieve long-term policy objectives, as well as deter the City's potential desire to develop future renewable energy projects. The City Council's 2015 Climate Action Plan established a goal of producing 15% of all electricity for City Operations from on-site renewable energy sources such as solar by 2030. The City's Plan also calls for expanded markets for renewable energy in Oregon. PacifiCorp's application would restrict these types of projects with a potentially detrimental impact of meeting the City's policy goals. PacifiCorp's proposed limitations on both contract duration and pricing could also potentially affect the City's ability to develop future renewable projects by significantly reducing the interests of third party investors in providing initial financing for such projects.

5. The issues the Petitioner intends to raise at the proceeding include:

PacifiCorp's proposal presents significant policy implications which are not necessarily balanced by benefits to ratepayers. The requested changes are contrary to the goals of the City's Climate Action Plan. The proposal would hamper the City's ability to support rural economic development, and its ability to continue to foster and support the Oregon solar industry. The proposal would slow the transition from fossil fuels as a source of electricity for the residents and businesses of Portland, and throughout Oregon. PacifiCorp's application may impact other Portland businesses and institutions that have an interest in developing larger scale solar projects, and other qualifying renewable generating facilities, thereby impacting the citizens of Portland. The City of Portland intends to raise issues that are related to this proceeding regarding the appropriate treatment of QF contract terms and pricing.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

The City of Portland has participated as a party in numerous dockets and matters before the Commission. The City of Portland brings a unique perspective to the issues presented in this proceeding.

7. Based on the information provided above in accordance with the Commission's rules of procedure, the City requests to participate in this proceeding as an intervener. The City will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. The City's intervention will not prejudice any party and it accepts the record, procedural schedule and scope of this proceeding as it stands. For all of these reasons, it is in the public interest to grant the City of Portland's Petition to Intervene.

Therefore, the City of Portland respectfully requests that the Commission grant its Petition to Intervene with full party status in this proceeding.

/s/ Benjamin Walters  
Benjamin Walters, Chief Deputy City Attorney  
Petitioner's Representative

September 2, 2015  
Date Signed