

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	DOCKET NO. UE-144160
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	
)	PETITION TO INTERVENE OF THE
v.)	RENEWABLE ENERGY COALITION
)	
PACIFICORP D/B/A PACIFIC POWER &)	
LIGHT COMPANY,)	
)	
<u>Respondent.</u>)	

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, the Renewable Energy Coalition (“REC”) petitions the Washington Utilities and Transportation Commission (the “Commission”) to intervene with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, the Coalition states as follows:

2. The name and address of REC is:

Renewable Energy Coalition
c/o John Lowe
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

3. REC will be represented in this proceeding by Sanger Law, PC. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

John Lowe
Renewable Energy Coalition
12050 SW Tremont Street
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

Irion Sanger
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4. REC was established in 2009, and is comprised of over thirty members that are small qualifying facilities (“QFs”) who own and operate nearly forty non-intermittent QFs in Oregon, Idaho, Washington, Utah, and Wyoming. REC’s members have power purchase agreements (“PPAs”) with Northwest utilities, including Pacific Power and Light Co. (“Pacific Power”). Yakima-Tieton Irrigation District has been a REC member since 2011, and sells its power to Pacific Power from two 1.4 megawatt hydroelectric projects (the Orchard and Cowiche projects).
5. REC has participated in numerous state regulatory proceedings related to QFs, PPAs, avoided costs, integrated resource planning, and the Public Utility Regulatory Policies Act (“PURPA”) throughout the Northwest. REC’s attorney has participated in numerous Commission proceedings, including Pacific Power filings.
6. Pacific Power has proposed a major revision in its historic methodology for calculating avoided cost rates in Washington. Pacific Power currently pays QFs 2 megawatts and under rates that include a capacity and energy payment. Pacific Power’s new proposed Schedule 37 rates include two major revisions, including: 1) completely eliminating the dollars per kilowatt month capacity rate; and 2) reducing the avoided cost rates for wind and solar by estimated integration costs.
7. REC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and any Commission determination made in connection with these proceedings could impact avoided cost rates or contract terms and

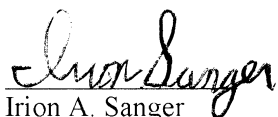
conditions available to REC's current and future members. REC opposes Pacific Power's proposed elimination of the capacity payment. REC intends to investigate Pacific Power's proposed filing to ensure that it complies with Washington law, and the federal Public Utility Regulatory Policies Act. REC intends to participate in all aspect of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

8. Without the opportunity to intervene herein, REC would be without a manner or means of participating in the lawful determination of issues that may affect the avoided cost rates or contract terms and conditions regarding PPAs for REC members.

9. WHEREFORE, REC 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 17th day of March, 2015.

Respectfully submitted,



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Of Attorneys for the Renewable Energy Coalition