

RECEIVED
2020 NOV 19 AM 11:59
IDAHO PUBLIC
UTILITIES COMMISSION

C. Tom Arkoosh, ISB No. 2253
Amber Dresslar, ISB No. 10536
ARKOOSH LAW OFFICES
802 W. Bannock Street, Suite LP 103
P.O. Box 2900
Boise, ID 83701
Telephone: (208) 343-5105
Facsimile: (208) 343-5456
Email: tom.arkoosh@arkoosh.com
amber.dresslar@arkoosh.com
Admin copy: erin.cecil@arkoosh.com

Attorneys for IdaHydro and the Renewable Energy Coalition

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY
MOUNTAIN POWER'S APPLICATION
FOR APPROVAL OF A CAPACITY
DEFICIENCY PERIOD TO BE USED
FOR AVOIDED COST CALCULATIONS

CASE NO. PAC-E-20-13

**RENEWABLE ENERGY
COALITION'S PETITION TO
INTERVENE**

Pursuant to the Idaho Public Utilities Commission's ("Commission") Rules of Procedure, Rule 71 IDAPA 31.01.01.71-073, the Renewable Energy Coalition ("Coalition") hereby petitions the Commission to intervene and appear with full party status, and as grounds therefore states as follows:

1. The name and address of Coalition is:

Renewable Energy Coalition
c/o John Lowe
PO Box 25576
Portland, OR 97298
Telephone: (503) 997- 3033
E-Mail: jravenesanmarcos@yahoo.com

2. Arkoosh Law Offices will represent Coalition in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed

below:

RENEWABLE ENERGY COALITION'S PETITION TO INTERVENE
PAC-E-20-13
PAGE 1 OF 4

John Lowe
Renewable Energy Coalition
PO Box 25576
Portland, OR 97298
Telephone: (503) 997- 3033
jravenesanmarcos@yahoo.com

Irion Sanger
Sanger Law, PC
1041 SE 58th Pl
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

C. Tom Arkoosh
Amber Dresslar
Arkoosh Law Offices
802 West Bannock St., Suite LP 103
P.O. Box 2900
Boise, ID 83701
Telephone: (208) 343-5105
Fax: (208) 343-5456
tom.arkoosh@arkoosh.com
amber.dresslar@arkoosh.com
erin.cecil@arkoosh.com

3. 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 has participated in numerous state regulatory proceedings intended to promote appropriate interconnection procedures, competitive markets, PURPA, renewable energy, diversity of generation ownership, and proceedings regarding QF contract and rate eligibility.

4. The Coalition has a substantial interest in this proceeding because a Commission decision on this matter will impact Rocky Mountain Power’s avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act (“PURPA”). The Coalition’s members are QFs that have (or intend to have) power purchase agreements (“PPAs”) with Idaho utilities with rates based on its avoided costs. The Coalition’s members sell power to Avista, Portland General Electric, Idaho Power, and PacifiCorp in Oregon, Idaho, Washington, Wyoming, and/or Utah, including Rocky Mountain Power in Idaho. Most of the Coalition’s members have existing

projects that have been operating and selling to utilities for numerous years; however, many Coalition members are attempting to construct new renewable energy projects. Without intervention, the Coalition would not have the ability to participate in the proceeding, which could result in material harm to its members.

5. 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 19th day of November 2020.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
*Attorneys for IdaHydro and the Renewable
Energy Coalition*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of November 2020, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
472W. Washington
Boise, ID 83702

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail
jan.noriyuki@puc.idaho.gov
secretary@puc.idaho.gov

Ted Weston
Emily Wegener
1407 West North Temple, Suite 330
Salt Lake City, UT 84116
Attorneys for Rocky Mountain Power

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail
ted.weston@pacificcorp.com
emily.wegener@pacificcorp.com

Ron Scheirer
825 NE Multnomah, Suite 600
Portland, OR 97232
Attorneys for Rocky Mountain Power

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail
ron.scheirer@pacificcorp.com

John Lowe
Renewable Energy Coalition
PO Box 25576
Portland, OR 97298

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail
jravenesanmarcos@yahoo.com

Irion Sanger
Sanger Law, PC
1041 SE 58th Pl
Portland, OR 97215

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail
irion@sanger-law.com



C. Tom Arkoosh