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IDAHO PUBLIC UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF A REVIEW OF THE  
SURROGATE AVOIDABLE RESOURCE  
(SAR) METHODOLOGY FOR  
CALCULATING PUBLISHED AVOIDED  
COST RATES

Case No. GNR-E-09-03

**PETITION OF RENEWABLE ENERGY COALITION  
FOR PARTY-INTERVENOR STATUS**

In accordance with Rule 72 of the IPUC's Rules of Procedure, the Renewable Energy Coalition ("REC"), an Oregon assumed business name for a coalition of renewable energy owners and developers of 16 existing or proposed hydroelectric or biomass projects located in Idaho, Oregon, and Montana which sell or are expected to sell their output to the three IPUC jurisdictional investor-owned electric utilities ("IOUs"), respectfully petitions the Commission for intervenor-party status in this proceeding.

**I. REC'S INTEREST IN THIS PROCEEDING**

The Renewable Energy Coalition has a direct and substantial interest in this proceeding because a number of its members' projects are either under contract to sell power at avoided-cost prices to the IOUs or, in the case of proposed projects, considering the sale of output to such IOUs. Consequently, any determinations made in this docket may affect the financial viability of its members.

Since REC represents only small non-intermittent Qualifying Facilities, most of which

have operated for a significant period, REC's interests are not represented by any party to this proceeding, and its comments will be directly relevant to the issues raised in this docket.

REC's intervention will not expand the scope of the proceeding.

II. **NOTICE**

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to counsel and REC's representative at the addresses set forth below (e-mail service is preferred):

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III. **CONCLUSION**

REC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, REC respectfully requests that the Commission: (a) to grant this Petition for Party-Intervenor Status, and (b) place REC on the service list for this proceeding.

Respectfully submitted,



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Attorney for Renewable Energy Coalition

June 15, 2010

## CERTIFICATE OF SERVICE

I hereby certify that I have on this 15th day of June, 2010, served a copy of the foregoing Petition of the Renewable Energy Coalition for Party-Intervenor Status on all parties of record in ENR-E-09-03 by serving an electronic copy on their email addresses of record as set forth below. The original and seven (7) copies were filed with the Commission by United States Mail, postage prepaid at Welches, Oregon.

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This Certificate of Service is executed on June 15, 2010, at Zigzag, Oregon.



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