

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**MOTION OF THE PUBLIC UTILITY DISTRICT NO. 1
OF COWLITZ COUNTY TO BECOME A PARTY**

Paul Brachvogel
General Counsel
Public Utility District No.1 of Cowlitz
County
PO Box 3007
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September 27, 2011

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Pursuant to Rule 1.4 and 11.1 of the California Public Utilities Commissions (“Commission’s”) Rules of Practice and Procedure, the Public Utility District No. 1 of Cowlitz County (“Cowlitz”) submits this motion to become a party in this proceeding, R.11-05-005.

I. DESCRIPTION OF COWLITZ

Cowlitz is a non-profit, Public Utility District located in Longview, Washington duly organized under Title 54 of the Revised Code of Washington. It is the second largest Bonneville Power Administration (BPA) preference customer, purchasing 550 aMW per year from BPA. Among other generation, Cowlitz maintains an interest in two wind generation projects, known as *Harvest Wind* and *White Creek Wind*, which have a total nameplate capacity of 303.6 MW. Cowlitz is within the BPA balancing authority.

II. COWLITZ’ INTERESTS IN THIS PROCEEDING

Both *White Creek Wind* and *Harvest Wind* were built to meet Cowlitz’ Renewable Portfolio Standards under the Energy Independence Act in Washington State, but also for the purposes of selling into the California market to those utilities seeking to meet their own Renewables Portfolio Standards under California law. Cowlitz developed *White Creek Wind* with other utilities, later conveying it to investors utilizing Production Tax Credits, but with whom Cowlitz and other developers entered into long term power purchase agreements for re-

sale, including sales into the California market. *Harvest Wind* was also developed with other utilities but ownership was retained by those utilities. Cowlitz has been a leader in renewable energy wind development as one of the nation's first public utilities to develop wind generation under the foregoing Production Tax Credit model, to the benefit of its ratepayers and those California utilities planning to meet their own Renewables Portfolio Standards.

Cowlitz expects continued renewable development in the region and sales into the California market, given both increasing resource constraints and stricter Renewables Portfolio Standards. Cowlitz is concerned that proposed rulemaking may unconstitutionally discriminate against out of state renewable generators, either facially or as applied. As such, Cowlitz has a strong and direct interest in the California Renewables Portfolio Standard and the Commission's proceedings to interpret and implement Senate Bill 2 (1x). Cowlitz respectfully requests that it be granted party status in this proceeding.

III. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to the following person:

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IV. CONCLUSION

Cowlitz respectfully requests that the Commission grant its motion for party status. Cowlitz' participation in this proceeding will not prejudice any other party to this proceeding or expand the scope of the issues to be considered. Finally, Cowlitz' participation can assist the

Commission's understanding related to the interconnection, scheduling, and concerns of out-of-state renewable energy resources generators, particularly from the Pacific Northwest region.

Respectfully submitted,

/s/Paul Brachvogel

Paul Brachvogel

General Counsel

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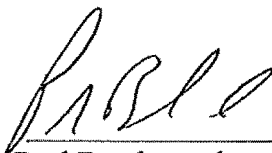
September 27, 2011

VERIFICATION

I, Paul Brachvogel, am General Counsel of Public Utility District No.1 of Cowlitz and am authorized to make this verification on its behalf. I do hereby verify that the information contained in the foregoing Motion is true, correct and complete to the best of my knowledge.

I verify that the foregoing is true under penalty of perjury.

Executed on the 27th day of September, 2011 at Longview, Washington.



Paul Brachvogel
General Counsel
Public Utility District No. 1 of Cowlitz County