

Susan K. Ackerman, Attorney  
9883 NW Nottage Dr.  
Portland, Oregon 97229

Telephone: (503) 297-2392  
Facsimile: (503) 297-2398  
Email: susan.k.ackerman@comcast.net

---

April 21, 2008

VIA Electronic Mail & U.S. Mail

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148

Re: UM 1374; NIPPC Petition to Intervene

Enclosed for filing is NIPPC's Petition to Intervene in this Docket. Hard copies will follow in the U.S. Mail. NIPPC shortly intends to sign and serve copies of the "Consent to be Bound" to the Protective Order in this matter.

Please call me if you have any questions.

Very truly yours,

**/s/ Susan K. Ackerman**

Susan K. Ackerman  
Attorney for NIPPC

Enclosures

## Certificate of Service

I certify that I have this day served the foregoing NIPPC Petition to Intervene upon all parties of record in UM 1374 by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to all parties or attorneys of parties, on the service list compiled by the OPUC.

Dated this 21<sup>st</sup> day of April, 2008.

/s/ Susan K. Ackerman  
Susan K. Ackerman  
Attorney for NIPPC  
9883 NW Nottage Dr.  
Portland, Oregon 97229

### UM 1374 Service List

LOWREY R BROWN lowrey@oregoncub.org	JASON EISDORFER jason@oregoncub.org
ROBERT JENKS bob@oregoncub.org	MELINDA J DAVISON 333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com
DAVID HATTON REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 david.hatton@state.or.us	NATALIE HOCKEN 825 NE MULTNOMAH SUITE 2000 PORTLAND OR 97232 natalie.hocken@pacificorp.com
OREGON DOCKETS 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com	BILL MCNAMEE PO BOX 2148 SALEM OR 97308-2148 bill.mcnamee@state.or.us
RANDALL J FALKENBERG PMB 362 8343 ROSWELL RD SANDY SPRINGS GA 30350 consultrfi@aol.com	

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON**

**UM 1374**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER )  
Petition for Waiver of the Commission's )  
Competitive Bidding Guidelines. )  
\_\_\_\_\_ )

**NORTHWEST & INTERMOUNTAIN  
POWER PRODUCERS COALITION  
PETITION TO INTERVENE AS A PARTY**

Pursuant to the Commission's Rules, OAR 860-013-0021, the Northwest & Intermountain Power Producers Coalition ("NIPPC") petitions to intervene as a party. In support of this Petition, NIPPC states as follows:

1. The name and address of the Petitioners are as follows:

Robert D. Kahn, Executive Director  
NIPPC  
1117 Minor Avenue, Suite 300  
Seattle, WA 98101  
Telephone: 206.236.7200  
Email: rkahn@nippc.org

2. The name and address of Petitioner's attorney is as follows:

Susan K. Ackerman, Attorney  
9883 NW Nottage Dr.  
Portland, Oregon 97229  
Telephone: 503.297.2392  
Email: susan.k.ackerman@comcast.net

3. NIPPC is a trade association whose members and associate members include independent power producers<sup>1</sup> active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of its members in

---

<sup>1</sup> Members include Calpine, Constellation Control and Dispatch, ENMAX Corporation, enXco, EPCOR, EverPower Renewables, Grays Harbor Energy Center LLC, Horizon Wind Energy, Mint Farm Energy Center, LLC., National Energy Systems Co., Sempra Energy Trading Corp., Sierra Pacific Industries, Suez Energy North America, Inc., TransAlta Energy Marketing, Inc., Transcanada, Sea Breeze Power Corp., Wallula Resource Recovery LLC.

developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

4. NIPPC has a substantial interest in this docket. NIPPC's members desire to advance competitive resource procurement policies in Oregon in the belief that such policies provide cost savings and other benefits for Oregon's economy and its electricity consumers. Toward that end, NIPPC has previously and actively participated in Docket Nos. UM 1066, UM 1182, LC 33, UM 1208, and UM 1276. This docket may raise substantial issues regarding how the Commission implements the "waiver" provisions of its recent Commission's Competitive Bidding Guidelines. *In the Matter of an Investigation Regarding Competitive Bidding*, Order No. 06-446 (August 10, 2006). NIPPC's interest in this docket is thus substantial and will not be represented by any other party.

5. NIPPC requests that the names of Robert Kahn and Susan Ackerman be placed on the official service list in this docket.

7. NIPPC waives paper service of documents.

6. For all the reasons stated herein, NIPPC asks that its request to intervene as a party in this docket be granted.

DATED this 21<sup>st</sup> day of April, 2008.

Attorney for NIPPC:

/s/ Susan K. Ackerman

Susan K. Ackerman, OSB # 83138

9883 NW Nottage Dr.

Portland, OR 97229

Tel: 503.297.2392

Fax: 504.297.2398

Email: susan.k.ackerman@comcast.net