

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

UM 1535

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE
COMPANY)	OF TEPPER LLC
)	
Request for Proposals for Capacity Resources.)	
)	

Tepper LLC (“Tepper”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS §756.525 and OAR 806-001-0300, for leave to intervene herein and appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Tepper LLC
c/o Chuck Sides
Management Group of Oregon, Inc.
PO Box 2087
Salem, OR 97308
Telephone: (503) 588-7099
Fax: (503) 588-6697

2. The Intervenor will be represented herein by:

J. Laurence Cable
Richard Lorenz
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Avenue, Suite 2000
Portland, Oregon 97204
Telephone: (503) 224-3092
Fax: (503) 224-3176
lcable@cablehuston.com
rlorenz@cablehuston.com

3. Tepper is a development company that is actively working on developing one or more power generating facilities in or near the service territory of Portland General Electric (“PGE”).

4. Tepper has a substantial interest in this docket. Tepper may wish to respond to PGE’s Request for Proposals (“RFP”). Tepper therefore has a direct interest in ensuring that PGE’s RFP is conducted in fair and equitable manner.

5. Tepper’s interests in this docket are not represented by any other party.

6. Granting Tepper’s petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

7. Tepper recognizes that on April 15, 2011, the Administrative Law Judge (“ALJ”) for this proceeding issued a Prehearing Conference Memorandum establishing a procedural schedule. That procedural schedule indicated that the date for intervention would be May 12, 2011. The ALJ also noted that, pursuant to ORS 756.525, any person may petition to intervene at any time before the close of the record. The administrative record for this proceeding has not been closed.

8. Tepper requests that Chuck Sides, J. Laurence Cable and Richard Lorenz be added to the official service list for this docket.

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WHEREFORE, Tepper respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

DATED this 24th day of May, 2011.

Respectfully submitted,

CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD, LLP

/s/ Richard Lorenz

J. Laurence Cable (OSB No. 710355)

Richard Lorenz (OSB No. 00308)

1001 SW Fifth Avenue, Suite 2000

Portland, OR 97204-1136

(503) 224-3092

(503) 224-3176-Fax

Attorneys for Tepper LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused to be served the foregoing **PETITION TO INTERVENE OF TEPPER LLC** either by electronic mail and/or by mailing to those parties who have not waived paper service on the parties listed below:

(W)= Waive Paper Service, (C)= Confidential

<p>JANET L PREWITT (C) (W) ASSISTANT AG Department of Justice NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us</p>	<p>IRION A SANGER (W) ASSOCIATE ATTY S. BRADLEY VAN CLEVE (W) DAVISON VAN CLEVE 333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com</p>
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<p>ROBERT D KAHN (W) EXECUTIVE DIRECTOR NW INDEPENDENT POWER PRODUCERS 1117 MINOR AVENUE, SUITE 300 SEATTLE WA 98101 rkahn@nippc.org; rkahn@rdkco.com</p>	<p>RANDY DAHLGREN (C) (W) RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC 121 SW SALMON ST - 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com</p>
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<p>WENDY GERLITZ (C) (W) SENIOR POLICY ASSOCIATE NW ENERGY COALITION 1205 SE FLAVEL PORTLAND OR 97202 wendy@nwenergy.org</p>	<p>MEGAN WALSETH DECKER (W) SENIOR STAFF COUNSEL JIMMY LINDSAY RENEWABLE NORTHWEST PROJECT 917 SW OAK, STE 303 PORTLAND OR 97205 megan@rnp.org jimmy@rnp.org</p>

DATED this 24th day of May, 2011.

/s/ Richard Lorenz
J. Laurence Cable (OSB No. 710355)
Richard Lorenz (OSB No. 00308)

Attorneys for Tepper LLC