## **BEFORE THE**

## PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON REPORT TO THE LEGISLATURE ON EFFECTIVENESS OF INCENTIVE PROGRAMS FOR SOLAR PHOTOVOLTAIC ENERGY UM 1673

NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION'S PETITION TO INTERVENE AND WAIVER OF PAPER SERVICE

The Northwest and Intermountain Power Producers Coalition ("NIPPC" or "Intervenor") hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Northwest and Intermountain Power Producers Coalition c/o Robert D. Kahn, Executive Director (W)
Telephone: 206-624-1546
<a href="mailto:rkahn@nippc.org">rkahn@nippc.org</a>

2. This Intervenor will be represented herein by:

Peter J. Richardson (OSB No. 06668) **(W)** Gregory M. Adams (OSB No. 101779) **(W)** Richardson Adams PLLC 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 Telephone: 208-938-7900

Fax: 208-938-7904

peter@richardsoanams.com greg@richardsonadams.com

3. NIPPC is a trade association whose members include independent power producers active in the Pacific Northwest and Western energy markets. A list of NIPPC's

members and associate members may be downloaded at <a href="https://www.nippc.org/info/members.tpl">www.nippc.org/info/members.tpl</a>. The purpose of NIPPC is to represent the interests of its members in developing rules and policies that help achieve a competitive wholesale electric power supply market in the Pacific Northwest, and including solar voltaic incentive rules and policies.

- 4. NIPPC's members desire to advance competitive resource procurement policies in Oregon and other such policies that provide cost savings and other benefits for Oregon's economy and its electricity consumers. Toward that end, NIPPC has previously participated in, or is currently participating in, Docket Nos. UM 1066, UM 1182, LC 33, UM 1208, UM 1276, UM 1374, UM 1429, UM 1499, LC 48, UE 248, UM 1540, UM 1535, UM 1613. NIPPC's interest in this docket will not be represented by any other party.
- 5. NIPPC has a substantial interest in this docket because it's members are active or potentially active in the independent power business including all forms of renewable power generation.
- 6. Without the opportunity to intervene herein, NIPPC would be without adequate means of participation in this proceeding which may have a material impact on its members' business activities in the State of Oregon.
- 7. Granting NIPPC's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.
- 8. For all the reasons stated herein, NIPPC asks that its Petition to Intervene be granted.
- 9. NIPPC requests that Peter J. Richardson, Gregory M. Adams, and Robert D. Kahn be placed on the official service list for this docket. NIPPC waives paper service.

## RESPECTFULLY SUBMITTED this 27th day of December, 2013.

RICHARDSON ADAMS PLLC

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Attorneys for Northwest and Intermountain Power Producers Coalition

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 27th day of December, 2013, a true and correct copy of the within and foregoing **Northwest and Intermountain Power Producers Coalition's Petition to Intervene** was served electronically to all parties:

By:

Peter Richardson