

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of:)	UM 1690
)	
Public Utility Commission of Oregon)	PETITION TO INTERVENE OF
)	NORTHWEST AND INTERMOUNTAIN
Voluntary Renewable Energy Tariffs for)	POWER PRODUCERS COALITION
Non-Residential Customers)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Northwest and Intermountain Power Producers Coalition (“NIPPC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status in this proceeding. In support of this petition to intervene, NIPPC provides the following information:

1. The name and address of the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition
c/o Robert D. Kahn, Executive Director
PO Box 504, Mercer
Island WA 98040
rkahn@nippc.org

2. Blue Planet Energy Law and Sanger Law will represent NIPPC in this proceeding. All documents relating to this proceeding should be served on the following persons at the addresses listed below:

Carl Fink
Blue Planet Energy Law, LLC
Suite 200
628 SW Chestnut Street
Portland, Oregon 97219
Telephone: 971.266.8940
CMFINK@Blueplanetlaw.com

Irion A. Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
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3. NIPPC requests that the names of Robert Kahn, Carl Fink and Irion Sanger be placed on the official service list for this docket.

4. NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets.¹ A fundamental purpose of NIPPC is to represent the interests of its members in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

5. This docket was originally opened by the Commission in April, 2014, to comply with HB 4126 (2014), which required the Commission to consider whether, and under what circumstances, it would be in the public interest to allow Oregon utilities to offer voluntary a renewable energy tariff (“VRET”). After significant proceedings and deliberations, the Commission ultimately determined that a utility would only be permitted to offer a VRET if, among other requirements, it did so under terms and conditions that mirror those available under Direct Access.² Both utilities declined to make a VRET proposal under these circumstances,³ and the Commission formally closed the proceeding in July, 2016.⁴ NIPPC was an active participant in these proceedings.

6. Portland General Electric Company (“PGE”) has now made a renewable energy tariff filing seeking to reopen the VRET proceeding, with an alternative request that the Commission open a new docket to consider PGE’s proposal. PGE’s proposal is not consistent with the express terms of the Commission’s prior orders in this docket. In comments filed May 3, 2018 in this proceeding, Staff recommends that the Commission address this matter in a new docket, rather than Docket UM 1690.

7. NIPPC intends to participate herein as a party in this docket, or any new docket established by the Commission, to address PGEs proposal. If necessary, NIPPC intends to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in

¹ A current list of NIPPC members can be found at <http://www.nippc.org/info/members.tpl>.

² See *In re Public Utility Commission of Oregon*, OPUC Docket No. UM 1690, Order No. 15-405 (Dec. 15, 2015); *In re Public Utility Commission of Oregon*, OPUC Docket No. UM 1690, Order No. 16-251 (July 5, 2016).

³ UM 1690 — PacifiCorp Letter filed April 14, 2018; UM 1690 — PGE Letter filed April 14, 2018.

⁴ Order No. 16-251, *supra*.

argument. The nature and quality of evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding.

8. Without the opportunity to intervene herein, NIPPC and its members would be without any means of participation in this proceeding which may have a material impact on its members' business activities in the State of Oregon.

9. Granting NIPPC's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

10. For all reason stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor with all rights incumbent to that status, whether in Docket No. UM 1690 or such other docket as may be established by the Commission to consider PGE's proposal. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 17th day of May, 2018.

s/Carl Fink

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