

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of)	DR 49
)	
GEORGIA-PACIFIC CONSUMER PRODUCTS (CAMAS) LLC)	PETITION TO INTERVENE OF
And)	NORTHWEST AND INTERMOUNTAIN
)	POWER PRODUCERS COALITION
CLATSKANIE PEOPLE’S UTILITY DISTRICT)	
)	
Petitioners)	

The Northwest & Intermountain Power Producers Coalition ("**NIPPC**") 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 the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition
c/o Robert D. Kahn, Executive Director
1117 Minor Avenue, Suite 300
Seattle, Washington 98101
Telephone: (206)236.7200
rkahn@nippc.org

2. Intervenor, NIPPC, will be represented herein by:

Carl Fink (OSB No. 980262)
Blue Planet Energy Law, LLC
Suite 200
628 SW Chestnut Street
Portland, Oregon 97219
Telephone: 971.266.8940
CMFINK@Blueplanetlaw.com

3. NIPPC requests that the names of Robert Kahn and Carl Fink 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 The 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, including fair, accurate and transparent pricing for electric power and transmission in the region and opportunities for fair and open retail competition in the electricity market. In the recent past, NIPPC has been active before the Commission on matters affecting retail direct access, including implementation of the direct access programs by PacifiCorp.

5. The petition for declaratory ruling in this case presents legal issues arising under Oregon's retail direct access law, ORS 757.600 et seq, and could also implicate PacifiCorp's direct access programs. As such, NIPPC and its members have a direct and substantial interest in this proceeding

6. NIPPC intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding.

7. Pursuant to OAR 860-001-0300(4), NIPPC accepts: (a) the statement of facts as set forth in and for the purposes of the petition for declaratory ruling, and (b) the statement of the questions presented in the petition for declaratory ruling.

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.

¹ NIPPC's members include Calpine Corporation, Capital Power Corporation, Constellation Energy Control & Dispatch, EDF Renewable Energy, Gridforce Energy Management, Invenergy LLC, Morgan Stanley, Noble Solutions, Perennial Power Holdings, Inc. Shell Energy North America, Sierra Pacific Industries, and TransAlta Energy Marketing, Inc.

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. NIPPC hereby waives paper service in this case.

11 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. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 8th day of May, 2015.

s/Carl Fink

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Power Producers Coalition