

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ELECTRIC)	UE 308
)	
2017 Power Cost Update Tariff Schedule 125)	PETITION TO INTERVENE
)	OF NOBLE AMERICAS ENERGY SOLUTIONS LLC

Noble Americas Energy Solutions LLC (“Noble Solutions”) 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:

Noble Americas Energy Solutions LLC
Attn: Greg Bass
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 699-5027
gbass@noblesolutions.com

2. Noble Solutions will be represented in this docket by:

Gregory M. Adams (OSB No. 101779)
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3. Copies of all pleadings, production requests, production responses, Commission

orders and other documents should be provided to the following:

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4. Noble Solutions is a national provider of retail energy services, including in the State of Oregon, and is a certified electricity service supplier (“ESS”) under Oregon law and regulations. *See* Order No. 10-453; Order No. 07-075; Order No. 02-133.

5. Noble Solutions and its predecessor entity, Sempra Energy Solutions LLC, have actively participated in numerous recent proceedings related to retail direct access, including OPUC dockets UE 216, UE 227, UE 236, UE 245, UE 262, UE 264, UE 267, UE 287, UE 296, UM 1587, UM 1690, and DR 49. The outcome of this proceeding will affect the rates charged to customer’s eligible for direct access and will also therefore affect Noble Solutions’ ability to provide retail electricity services in the State of Oregon. Noble Solutions therefore claims a direct and substantial interest in this proceeding.

6. Noble Solutions has been an active participant in several Commission dockets that affect the Commission’s implementation of Oregon’s retail direct access law, and Noble

Solutions possesses unique knowledge and expertise that will assist the Commission in evaluating the Portland General Electric Company's proposed rates in this proceeding.

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

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

WHEREFORE, Noble Americas Energy Solutions LLC respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 6th day of April, 2016.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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Of Attorneys for Noble Americas Energy Solutions LLC