

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1791**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY	)	NORTHWEST AND
	)	INTERMOUNTAIN POWER
Application for Deferral of Incremental	)	PRODUCERS COALITION PETITION
Revenue Requirement Associated with the	)	TO INTERVENE
Carty Generating Station and Delay of	)	
Commission Review of PGE's Application	)	
<u>until Legal Actions are Resolved</u>	)	

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 support of this petition to intervene, NIPPC provides the following information:

The name and address of NIPPC is:

Northwest and Intermountain Power Producers Coalition  
Robert D. Kahn  
Executive Director  
P.O. Box 504  
Mercer Island, Washington 98040  
Telephone: (206) 236-7200  
rkahn@nippc.org

Sanger Law, PC will represent NIPPC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Irion A. Sanger  
Sanger Law, PC  
1117 SE 53rd Avenue  
Portland, OR 97215  
Telephone: (503) 756-7533  
Fax: (503) 334-2235  
irion@sanger-law.com

Robert Kahn  
Executive Director  
Northwest and Intermountain Power  
Producers Coalition  
P.O. Box 504  
Mercer Island, Washington 98040  
Telephone: (206) 236-7200  
rkahn@nippc.org

Sidney Villanueva  
Sanger Law, PC  
1117 SE 53rd Avenue  
Portland, OR 97215  
Telephone: (503) 515-1981  
Fax: (503) 334-2235  
sidney@sanger-law.com

NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.<sup>1</sup> 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.

NIPPC has a substantial interest in this proceeding because PGE's Deferral Request could have a significant impact on Oregon's regulatory policies regarding utility resource ownership, as well as NIPPC's members' ability to participate in competitive energy markets and sell power to Oregon customers. In addition, NIPPC was involved in the underlying proceedings in which the Carty resource was selected, and continues to

---

<sup>1</sup> NIPPC's members include: Calpine, Capital Power, Constellation Energy, Cypress Creek Renewables, Direct Energy, EDF Renewables, EDP Renewables, Invenergy, KapStone Paper, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power, Shell Energy North America, Sierra Pacific Industries, and TransAlta Energy Marketing.

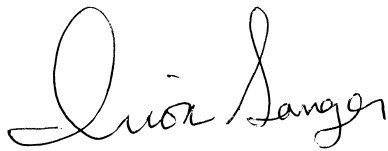
monitor the development of Carty project. NIPPC's interests are not be adequately represented by any other party in this proceeding.

NIPPC has participated in numerous regulatory proceedings related to RFPs, bidding guidelines, and competitive markets. NIPPC's legal counsel has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities, including PGE. NIPPC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, NIPPC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 29th day of September 2017.

Respectfully submitted,



---

Irion Sanger  
Sidney Villanueva  
Sanger Law, PC  
1117 SE 53rd Avenue  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
irion@sanger-law.com

Of Attorneys for the Northwest and Intermountain  
Power Producers Coalition