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2 BEFORE THE PUBLIC UTILITY

3 COMMISSION OF OREGON

4  
5 UM 1824

6 IN THE MATTER OF THE PUBLIC UTILITY | Case No.: UM 1824  
7 COMMISSION OF OREGON,  
8 INVESTIGATION INTO PACIFICORP'S  
9 OREGON-SPECIFIC COST ALLOCATION  
ISSUES

PETITION TO INTERVENE OF THE  
NORTHWEST AND INTERMOUNTAIN  
POWER PRODUCER'S COALITION

10 COMES NOW, the Northwest and Intermountain Power Producer's Coalition  
11 ("NIPPC") and hereby petitions the Public Utility Commission of Oregon ("Commission"),  
12 pursuant to ORS 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear as  
13 a party, and as ground therefore states as follows:  
14

15 1. The name and address of this Intervenor is:

16 Northwest and Intermountain Power Producer's Coalition ("NIPPC")  
17 Attn: Robert D. Kahn  
18 Executive Director  
19 PO Box 504  
20 Mercer Island, WA 98040  
(206) 236-7200  
[rkahn@nippc.org](mailto:rkahn@nippc.org)

21 2. NIPPC will be represented in this docket by:

22 Peter Richardson, OSB No. 066687  
23 Gregory M. Adams, OSB No. 101779  
24 Richardson Adams, PLLC  
25 515 N. 27<sup>th</sup> Street  
26 Boise, ID 83702  
(208) 938-7901  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

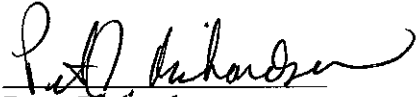
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28 PETITION TO INTERVENE OF THE NORTHWEST AND INTERMOUNTAIN POWER PRODUCER'S  
COALITION - 1

- 1 3. Copies of all pleadings, discovery, Commission orders and other documents should  
2 be provided to Messrs. Kahn, Adams and Richardson at the addresses noted above.
- 3 4. NIPPC is a trade association whose members include private industry participants  
4 active in the Pacific Northwest and Western energy markets. One of the goals of  
5 NIPPC is to further the interests of independent power producers and marketers in  
6 developing rules and policies that help achieve a competitive electric power supply  
7 market in the Pacific Northwest and intermountain states. Pursuant to OAR 860-001-  
8 0300, NIPPC submits that there are currently fifteen (15) companies or firms that are full  
9 members of NIPPC, and four (4) companies or firms that are associate members of  
10 NIPPC.  
11
- 12 5. NIPPC has a direct and substantial interest in this matter, because any Commission  
13 decision or policy that could result herein may impact the ability of electric service  
14 suppliers to sell energy in Oregon to end use consumers.
- 15 6. NIPPC has previously participated in numerous regulatory proceedings intended to  
16 promote competitive markets, including this Commission's proceedings regarding  
17 direct access. NIPPC's participation herein will assist the Commission in formulating  
18 policies and resolving issues. Nor will NIPPC's participation herein will broaden the  
19 issues, burden the record or delay the proceeding.  
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21

22 WHEREFORE, NIPPC respectfully requests the Commission grant its Petition to  
23 Intervene with full party status in this proceeding and to appear and participate in all matters  
24 as necessary and appropriate; and to present evidence call and examine witnesses, cross-  
25 examine witnesses, present argument, and to otherwise fully participate in this proceeding.  
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1 Dated this 24<sup>th</sup> date of October 2017.

2 Respectfully submitted,

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6 Richardson Adams, PLLC  
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10 Attorneys for the Northwest and Intermountain  
11 Power Producer's Coalition