

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1837**

|   |   |                       |
|---|---|-----------------------|
| In the Matter of                        | ) |                       |
|   | ) |                       |
| PUBLIC UTILITY COMMISSION OF            | ) | NORTHWEST AND         |
| OREGON,                                 | ) | INTERMOUNTAIN POWER   |
|   | ) | PRODUCERS COALITION'S |
| Investigation into the Treatment of New | ) | PETITION TO INTERVENE |
| <u>Facility Direct Access Load</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 and Blue Planet Energy Law will represent NIPPC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Robert Kahn  
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NIPPC is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of independent power producers and marketers in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

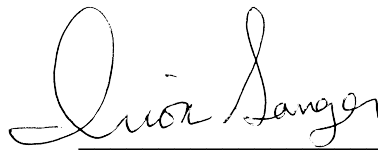
NIPPC has a substantial interest in this proceeding, because any Commission decision could result in the increased ability of electricity service supplier to sell energy to Oregon end use consumers. NIPPC was the primary proponent of Senate Bill 979, which would have encouraged businesses seeking to leave utility cost of service for direct access to do so provided they exclusively powered their enterprises with renewable energy. The final version of the legislation as considered by the Oregon Senate Business and Transportation Committee on April 3rd exempted certain loads from the obligation to pay exit fees. Committee Chair Senator Lee Beyer declined to move the bill choosing instead to request the OPUC to consider lifting transition charges for new loads.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, including the Commission's proceedings regarding direct access. 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. Finally, NIPPC's interest are not adequately represented by any other party in 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 26th day of May 2017.

Respectfully submitted,



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Attorney for the Northwest and Intermountain  
Power Producers Coalition