

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP,	)	UE 399
DBA: PACIFIC POWER,	)	
	)	PETITION TO INTERVENE OF
Request for General Rate Revision	)	CALPINE ENERGY SOLUTIONS,
_____	)	LLC

Calpine Energy Solutions, LLC (“Calpine Solutions”) hereby petitions the Public Utility Commission of Oregon (“OPUC” or “Commission”), pursuant to ORS 756.525 and OAR 860-001-0300, to intervene and appear and participate as a party herein, and as ground therefore states as follows:

1. The name and address of this Intervenor is:

Calpine Energy Solutions, LLC  
Attn: Greg Bass  
401 West A Street, Suite 500  
San Diego, California 92101  
Telephone: (619) 684-8199  
Fax: (619) 684-8355  
greg.bass@calpinesolutions.com

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

Gregory M. Adams (OSB No. 101779)  
Peter J. Richardson (OSB No. 066687)  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
Boise, Idaho 83702  
Telephone: (208) 938-2236  
Fax: (208) 938-7904  
greg@richardsonadams.com  
peter@richardsonadams.com

3. Copies of all pleadings, discovery, Commission orders and other documents

should be provided to the following persons:

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Richardson Adams, PLLC  
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Boise, Idaho 83702  
Telephone: (208) 938-2236  
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greg@richardsonadams.com

Greg Bass  
Calpine Energy Solutions, LLC  
401 West A Street, Suite 500  
San Diego, California 92101  
Telephone: (619) 684-8199  
Fax: (619) 684-8355  
greg.bass@calpinesolutions.com

Kevin C. Higgins  
Principal, Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, Utah 84111  
Telephone: 801-355-4365  
khiggins@energystrat.com

4. Calpine 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. 16-479; Order No. 10-453; Order No. 07-075; Order No. 02-133.

5. Calpine Solutions and its predecessor entities, Noble Americas Energy Solutions LLC and Sempra Energy Solutions LLC, have actively participated in numerous proceedings related to retail direct access, including before the Commission. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and customers currently participating in direct access and will also therefore affect Calpine Solutions’ ability to provide retail electricity services in the State of Oregon. Calpine Solutions therefore claims a direct and substantial interest in this proceeding.

6. Calpine 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 Calpine Solutions will introduce is dependent upon the nature and effect of other evidence in this proceeding.

7. Without the opportunity to intervene herein, Calpine 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, Calpine 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 8th day of March, 2022.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No.101779)

515 N. 27<sup>th</sup> Street

Boise, Idaho 83702

Telephone: (208) 938-2236

Fax: (208) 938-7904

greg@richardsonadams.com

Of Attorneys for Calpine Energy  
Solutions, LLC