

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1050

In the Matter of)	
)	
PACIFICORP)	NORTHWEST AND
)	INTERMOUNTAIN POWER
Request to Initiate an Investigation of Multi-)	PRODUCERS COALITION PETITION
Jurisdictional Issues and Approve an Inter-)	TO INTERVENE
Jurisdictional Cost Allocation Protocol)	
)	
_____)	

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
1117 Minor Avenue, Suite 300
Seattle, Washington 98101
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
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NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.¹ 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 the 2017 Protocol could have a significant impact on direct access and non-utility resource generation ownership. NIPPC's members' ability to participate in competitive energy markets and sell power to Oregon customers may be directly impacted by this proceeding. NIPPC's interests are not be adequately represented by any other party in this proceeding.

NIPPC has participated in numerous regulatory proceedings related to PacifiCorp, competitive markets, and direct access. NIPPC's attorney has participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities, including PacifiCorp. NIPPC understands that staff and intervenor direct testimony is due on April 1, 2016, and NIPPC agrees to the schedule that has been set to date.

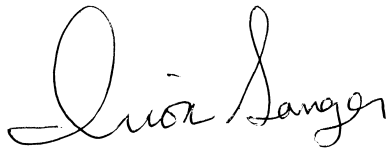
¹ NIPPC's members and associate members include: Calpine, Capital Power, Constellation Energy, EDF Renewables, Gridforce Energy Management, Invenergy, KapStone Paper, Morgan Stanley, Noble Solutions, Perennial Power, Shell Energy North America, Sierra Pacific Industries, and TransAlta.

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 31st day of March 2016.

Respectfully submitted,

A handwritten signature in cursive script that reads "Irion Sanger". The signature is written in black ink and is positioned centrally below the text "Respectfully submitted,".

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Of Attorneys for the Northwest and Intermountain
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