

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**DR 51**

In the Matter of	)	
	)	
CYPRESS CREEK RENEWABLES, LLC,	)	NORTHWEST AND
	)	INTERMOUNTAIN POWER
Petition for Declaratory Ruling	)	PRODUCERS COALITION'S
_____	)	PETITION TO INTERVENE

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  
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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:

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NIPPC is a trade association whose 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 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 PacifiCorp's interpretation of the Commission's policy on renewable avoided costs rates openly discriminates against large QFs and could have a significant impact on the power market in Oregon. Independent power producers, including NIPPC's members such as Cypress Creek, have energy projects above the Commission's standard contract size and are therefore directly affected by the need for the Commission to uphold its position on this issue.

NIPPC has participated in numerous regulatory proceedings promoting competitive markets, including the Commission's bidding guidelines, and the utilities'

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

most recent requests for proposals to add resources. 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 7th day of October 2016.

Respectfully submitted,



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Of Attorneys for the Northwest and Intermountain  
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