BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

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| In the Matter of |) | |
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| |) | NORTHWEST AND |
| PORTLAND GENERAL ELECTRIC |) | INTERMOUNTAIN POWER |
| COMPANY, |) | PRODUCERS COALITION'S |
| |) | PETITION TO INTERVENE |
| 2016 Integrated Resource Plan |) | |

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 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 regarding PGE's 2016 integrated resource plan ("IRP") could have a significant impact on the power markets in Oregon. Independent power producers, including NIPPC's members, recognize that the Commission's process drives resource acquisition decisions and can have a direct effect on utility pricing.

Also, NIPPC anticipates that PGE will file a new RFP soon, and is therefore particularly interested in PGE's current resource acquisition strategy.

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

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 1st day of November 2016.

Respectfully submitted,

Sidney Vllanueva

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