## **BEFORE THE**

## PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL	)	UE 319
ELECTRIC COMPANY,	)	
	)	PETITION TO INTERVENE
Request for a General Rate Revision	)	OF CALPINE ENERGY
	)	SOLUTIONS, LLC

Calpine Energy Solutions, LLC ("Calpine Solutions") hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to ORS 756.525 and OAR 860-001-0300(2), for leave to intervene herein and to appear and participate herein as a party, 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

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peter@richardsonadams.com
greg@richardsonadams.com

3. Copies of all pleadings, production requests, production responses,

Commission orders and other documents should be provided to the following persons:

Gregory M. Adams Richardson Adams, PLLC 515 N 27<sup>th</sup> St. Boise, Idaho 83702 Telephone: (208) 938-2236

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- 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 Commission proceedings related to retail direct access, including OPUC dockets UE 216, UE 227, UE 236, UE 245, UE 262, UE 264, UE 267, UE 287, UE 296, UE 307, UE 308, UE 313, UM 1587, UM 1690, and DR 49. 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.

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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 15<sup>th</sup> day of March, 2017.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No.101779)

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Of Attorneys for Calpine Energy

Solutions, LLC

CALPINE ENERGY SOLUTIONS, LLC'S PETITION TO INTERVENE