

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1396  
Phase II**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

PETITION TO INTERVENE OF  
NORTHWEST ENERGY SYSTEMS  
CO., LLC

Investigation into determination of  
resource sufficiency, pursuant to Order  
No. 06-538

Pursuant to ORS § 756.525 and OAR § 860-011-0000(6) and OAR § 860-012-0001 and the Prehearing Conference Memorandum issued on January 21, 2011 by Administrative Law Judge Power, Northwest Energy Systems Company, LLC, a limited liability company incorporated in Washington (“NESCO”), hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this petition, NESCO represents as follows:

1. All documents relating to these proceedings should be served on the following individual at the business address of NESCO:

Attn: Daren Anderson  
Northwest Energy Systems Company, LLC  
10800 NE 8<sup>th</sup> St, Suite 320  
Bellevue, WA 98004-1600  
E-mail: da@thenescogroup.com  
Telephone: (425) 457-7485

3. NESCO is a limited liability company with offices in Bellevue, Washington. NESCO intends to construct, own, operate and maintain a qualifying biomass facility in Klamath Falls, Oregon. NESCO is also actively developing other potential qualifying biomass facilities

within Oregon. NESCO contemplates selling the power from these qualifying facilities within Oregon at avoided cost.

4. NESCO has a substantial interest in the Commission's investigation to resource sufficiency because of the impact that decision could have on the avoided cost rate at which it will be able to sell its power to utilities within Oregon. As a result, the investigation and determination could directly affect NESCO's future sales of power and its business operations.

5. NESCO's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. As described above, NESCO has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow NESCO to intervene in this proceeding.

WHEREFORE, NESCO respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

The undersigned representative hereby consents to receipt of all materials related to this docket by electronic transmission to the email address specified in paragraph 2 above.

Dated this 4<sup>th</sup> day of February, 2011.

Respectfully submitted,

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/s/  
Daren Anderson  
10800 NE 8<sup>th</sup> St, Suite 320  
Bellevue, WA 98004-1600  
E-mail: da@thenescogroup.com  
Telephone: (425) 457-7485

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on February 4, 2011, I filed the original and five copies of **PETITION TO INTERVENE OF NORTHWEST ENERGY SYSTEMS CO., LLC** with Patrick Power, Administrative Law Judge, Public Utility Commission, 550 Capitol Street, NE, Salem, OR 97310, by first class mail and by email to Ed Durrenberger at [ed.durrenberger@state.or.us](mailto:ed.durrenberger@state.or.us). I further certify that a true and correct copy of **PETITION TO INTERVENE OF NORTHWEST ENERGY SYSTEMS CO., LLC** was served on the parties listed on the service/mailling list below by email and by regular first-class mail with sufficient first-class postage prepaid (unless indicated by email only).

<b>Email Only</b>	THOMAS H NELSON ATTORNEY AT LAW	PO BOX 1211 WELCHES OR 97067-1211 nelson@thnelson.com
<b>Email Only</b>	<b>*DEPARTMENT OF JUSTICE</b>  JANET L PREWITT ASSISTANT AG	NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us
<b>Email Only</b>	<b>*OREGON DEPARTMENT OF ENERGY</b>  MATT KRUMENAUER SENIOR POLICY ANALYST	625 MARION ST NE SALEM OR 97301 matt.krumenauer@state.or.us
	VIJAY A SATYAL SENIOR POLICY ANALYST	625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us
<b>Email Only</b>	<b>ANNALA, CAREY, BAKER, ET AL., PC</b>  WILL K CAREY	PO BOX 325 HOOD RIVER OR 97031 wcarey@hoodriverattorneys.com
<b>Email Only</b>	<b>CITIZENS' UTILITY BOARD OF OREGON</b>  ROBERT JENKS EXECUTIVE DIRECTOR	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
	G. CATRIONA MCCRACKEN	610 SW BROADWAY, STE 400

	LEGAL COUNSEL/STAFF ATTY	PORTLAND OR 97205 catriona@oregoncub.org
<b>Email Only</b>	<b>COMMUNITY RENEWABLE ENERGY ASSOCIATION</b>	
	PAUL R WOODIN EXECUTIVE DIRECTOR	1113 KELLY AVE THE DALLES OR 97058 pwoodin@communityrenewables.org
	<b>DAVISON VAN CLEVE</b>	
	IRION A SANGER ASSOCIATE ATTORNEY	333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com
<b>Email Only</b>	<b>DEPARTMENT OF JUSTICE</b>	
	STEPHANIE S ANDRUS ASSISTANT ATTORNEY GENERAL	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
<b>Email Only</b>	<b>ENERGY TRUST OF OREGON</b>	
	ELAINE PRAUSE	851 SW 6TH AVE STE 1200 PORTLAND OR 97204 elaine.prause@energytrust.org
	JOHN M VOLKMAN GENERAL COUNSEL	851 SW 6TH AVE SUITE 1200 PORTLAND OR 97204 john.volkman@energytrust.org
<b>Email Only</b>	<b>IDAHO POWER COMPANY</b>	
	CHRISTA BEARRY	PO BOX 70 BOISE ID 83707-0070 cbearry@idahopower.com
	DONOVAN E WALKER CORPORATE COUNSEL	PO BOX 70 BOISE ID 83707-0070 dwalker@idahopower.com
<b>Email Only</b>	<b>MCDOWELL RACKNER &amp; GIBSON PC</b>	
	LISA F RACKNER ATTORNEY	419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 lisa@mcd-law.com
<b>Email Only</b>	<b>OREGON PUBLIC UTILITY COMMISSION</b>	
	ED DURRENBERGER	PO BOX 2148 SALEM OR 97308-2148 ed.durrenberger@state.or.us
<b>Email Only</b>	<b>PACIFIC POWER &amp; LIGHT</b>	
	JORDAN A WHITE SENIOR COUNSEL	1407 W. NORTH TEMPLE, STE 320 SALT LAKE CITY UT 84116 jordan.white@pacificcorp.com

**PACIFICORP, DBA PACIFIC  
POWER**

OREGON DOCKETS

825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

**PORTLAND GENERAL ELECTRIC**

RANDALL DAHLGREN

121 SW SALMON ST - 1WTC0702  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

**PORTLAND GENERAL ELECTRIC  
COMPANY**

J RICHARD GEORGE

121 SW SALMON ST 1WTC1301  
PORTLAND OR 97204  
richard.george@pgn.com

**RFI CONSULTING INC**

RANDALL J FALKENBERG

PMB 362  
8343 ROSWELL RD  
SANDY SPRINGS GA 30350  
consultrfi@aol.com

**Email Only**

**RICHARDSON & O'LEARY**

GREGORY M. ADAMS

PO BOX 7218  
BOISE ID 83702  
greg@richardsonandoleary.com

**Email Only**

**RICHARDSON & O'LEARY PLLC**

PETER J RICHARDSON

PO BOX 7218  
BOISE ID 83707  
peter@richardsonandoleary.com

**STOLL BERNE**

DAVID A LOKTING

209 SW OAK STREET, SUITE 500  
PORTLAND OR 97204  
dlokting@stollberne.com

Dated: February 4, 2011.

/s/

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Chris Dorling  
10800 NE 8<sup>th</sup> St, Suite 320  
Bellevue, WA 98004-1600  
E-mail: chrisd@theNESCOgroup.com  
Telephone: (425) 457-7485