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Attorneys for Northwest and Intermountain
Power Producers Coalition

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

**In the Matter of
PORTLAND GENERAL ELECTRIC
Request for Proposals for Capacity
Resources.**

)
) UM 1535
)
) NORTHWEST AND
) INTERMOUNTAIN POWER
) PRODUCERS COALITION’S
) PETITION TO INTERVENE
)

The Northwest and Intermountain Power Producers Coalition (“NIPPC” or “Intervenor”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Northwest and Intermountain Power Producers Coalition
c/o Robert D. Kahn, Executive Director
1117 Minor Avenue, Suite 300
Seattle, Washington 98101
Telephone: 206-236-7200
Fax: 206-624-1235
rkahn@nippc.org

2. This Intervenor will be represented herein by:

Peter J. Richardson (OSB No. 06668)
Gregory M. Adams (OSB No. 101779)
Richardson & O’Leary PLLC
515 N. 27th Street
P.O. Box 7218
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3. 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, and monitoring competitive solicitations for compliance with existing rules and policies.

4. NIPPC has a substantial interest in this docket. NIPPC’s members desire to advance competitive resource procurement policies in Oregon in the belief that such policies provide cost savings and other benefits for Oregon’s economy and its electricity consumers. Toward that end, NIPPC has previously and actively participated in Docket Nos. UM 1066, UM 1182, LC 33, UM 1208, UM 1276, UM 1374, UM 1429, UM 1499, and LC 48. NIPPC’s interest in this docket will not be represented by any other party.

5. Without the opportunity to intervene herein, NIPPC would be without adequate means of participation in this proceeding which may have a material impact on its members’

¹ NIPPC’s members include Calpine, Capital Power Operations (USA) Inc., Constellation Energy Control & Dispatch, EverPower Renewables, Exergy Development Group, First Wind, Fort Chicago U.S. Power /Veresen Inc., Horizon Wind Energy, Invenergy LLC, Ridgeline Energy, Shell Energy North America, TransAlta Energy Marketing, Inc., and TransCanada.

business activities in the State of Oregon.

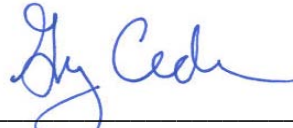
6. Granting NIPPC's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

7. For all the reasons stated herein, NIPPC asks that its Petition to Intervene be granted.

8. NIPPC requests that Peter J. Richardson, Gregory M. Adams, and Robert D. Kahn be placed on the official service list for this docket.

RESPECTFULLY SUBMITTED this 29th day of March, 2011.

RICHARDSON & O'LEARY PLLC



Peter J. Richardson (OSB No. 06668)
Gregory M. Adams (OSB No. 101779)
Attorneys for Northwest and Intermountain
Power Producers Coalition

CERTIFICATE OF SERVICE

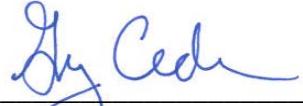
I HEREBY CERTIFY that on the 29th day of March, 2011, a true and correct copy of the within and foregoing **Northwest and Intermountain Power Producers Coalition's Petition to Intervene** was served as shown to:

KELCEY BROWN
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 U.S. Mail, postage pre-paid
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Hand Delivery
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 Facsimile
 Electronic Mail

By: 

Gregory M. Adams