

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1909

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	NORTHWEST AND
OREGON)	INTERMOUNTAIN POWER
)	PRODUCERS COALITION
Investigation of the Commission's Legal)	PETITION TO INTERVENE
Authority to Defer Capital Costs)	
_____)	

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
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Telephone: (206) 236-7200
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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 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.

NIPPC has a substantial interest in this proceeding because the Commission's deferral authority could have a substantial impact on Oregon's regulatory policies, especially regarding utility resource acquisition, which naturally implicates NIPPC's members' ability to participate in competitive energy markets and sell power to Oregon customers. NIPPC was involved in the underlying proceeding in which PGE requested

¹ NIPPC's members include: Calpine, Capital Power, Constellation Energy, Cypress Creek Renewables, Direct Energy, EDF Renewables, EDP Renewables, Invenergy, KapStone Paper, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power, Shell Energy North America, Sierra Pacific Industries, and TransAlta Energy Marketing.


deferral of the Carty cost overruns, and intends to continue its participation in that docket once the Commission has made a determination about its statutory authority to defer capital costs. NIPPC's interests are not be adequately represented by any other party in this proceeding.

NIPPC has participated in various Commission proceedings including the utilities' most recent requests for proposals and integrated resource planning, as well as the Commission's investigation into its competitive bidding guidelines. NIPPC's legal counsel has also participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities. 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.

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 December 2017.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

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Of Attorneys for the Northwest and Intermountain
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