

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,)	UM 1920
)	
Deferral of Benefits Associated with US Tax Reconciliation Act)	PETITION TO INTERVENE 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 grounds 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. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
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:

Gregory M. Adams
Richardson Adams, PLLC
515 N. 27th St.
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
greg@richardsonadams.com

Kevin C. Higgins
Principal
Energy Strategies, LLC
215 South State Street, Suite 200
Salt Lake City, Utah 84111
Telephone: (801) 355-4365
Fax: (801) 521-9142
khiggins@energystrat.com

Greg Bass, Regulatory Director
Calpine Energy Solutions LLC
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 684-8355
greg.bass@calpinesolutions.com

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, UE 323, UE 335, UM 1587, UM 1690, UM 1837 and DR 49. The outcome of this proceeding will affect the rates charged to customer’s eligible for 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.

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 26th day of September 2018.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)
515 N. 27th Street
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
greg@richardsonadams.com
Of Attorneys for Calpine Energy Solutions,
LLC