

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1934

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|--------------------------------|---|-------------------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC |) | CP Energy Marketing (US) Inc. |
| COMPANY, |) | PETITION TO INTERVENE |
| |) | |
| 2018 Request for Proposals for |) | |
| <u>Renewable Resources.</u> |) | |

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), CP Energy Marketing (US) Inc. (“**CPEMUS**” or “**Intervenor**”) petitions the Oregon Public Utility Commission (the “**Commission**”) to intervene and appear with full party status in the above-captioned proceeding. In support of this petition to intervene, CPEMUS provides the following information:

1. The name and address of the Intervenor is as follows:

CP Energy Marketing (US) Inc.
Chris Bursaw
Director of Regulatory & Environmental Policy US
CP Energy Marketing (US) Inc.
155 Federal Street Suite 1200
Boston, MA 02110
(617) 330-1341
CBursaw@capitalpower.com

2. Intervenor will be represented herein by:

Carl Fink (OSB No. 980262)
Blue Planet Energy Law, LLC
Suite 200
628 SW Chestnut Street
Portland, Oregon 97219
Telephone: 971.266.8940
CMFINK@Blueplanetlaw.com

3. CPEMUS requests that the names of Chris Bursaw and Carl Fink be placed on the official service list for this docket on behalf of Intervenor.

4. CPEMUS is a wholly-owned indirect subsidiary of Capital Power Corporation. Capital Power owns approximately 4,500 megawatts of power generation capacity at 24 facilities and is pursuing contracted generation capacity throughout North America, including development of two renewable power generation facilities located in Oregon.

5. CPEMUS has a substantial interest in this proceeding, because any Commission decision regarding Portland General Electric Company's ("PGE") request for proposal ("RFP") could have a significant impact on CPEMUS' ability to compete to provide power to PGE and/or other entities in the Pacific Northwest. CPEMUS' intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, CPEMUS' interests are not adequately represented by any other party in this proceeding.

WHEREFORE, CPEMUS 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 20th day of March 2018.

Respectfully submitted,

s/ Carl Fink

Carl Fink (OSB # 980262)
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Portland, OR 97219
Telephone: (971)266.8940
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Attorney for CP Energy Marketing (US) Inc.