

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1728

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

PETITION TO INTERVENE

NewSun Energy LLC petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Jacob H. Stephens  
Company: NewSun Energy LLC  
Street Address: 3500 S. DuPont Hwy #H  
City, State, Zip: Dover, DE 19901  
Email Address: jstephens@newsunenergy.net  
Telephone: 520-261-8094

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Jacob H. Stephens. List of Members - n/a

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Ownership of current and prospective QF projects under development for power sales under PURPA to PGE.

5. The issues the Petitioner intends to raise at the proceeding are:

Related to applicable regulatory matters as relates the issues in the docket, including particularly as relates the basis, method, inputs, policies, calculations, assumptions, and other items affecting the calculation of PGE's avoided costs for QFs, including as proposed to be update at this time and from time to time hereafter.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Direct experience in the development of power generation, including renewable energy, solar, QFs (of varying technologies), Oregon-specific power development, including related economics, technologies, financing and investment matters, the role and activity of independent engineers in power generation, expertise in interconnection and transmission matters, throughout the country and WECC and particularly as related Oregon utilities and Bonneville Power Administration's system, tariff, business practices, and actual implementation. This experience includes past and current contracting with PGE (and other utilities) for QF contracts, as well as ongoing development and construction and operation of facilities in Oregon today, including as connected to (and wheeling power through) the BPA system and selling power to PGE currently under QF standard PPAs with standard rates, as well as arranging risk capital, long-term financing, tax equity, and construction debt for several facilities starting operations over the 2019-20 time period. 16 years experience in nearly all aspects of solar and power generation development, with roughly 5 years actively and primarily focused on Oregon, BPA, the pacific northwest, and the

region's utilities, project execution, and the regulatory matters affecting the region particularly as relates issues listed above.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Jacob H. Stephens  
Petitioner or Petitioner's Representative

4/28/2020  
Date Signed