

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
**LC 68**

---

In the Matter of:	)	
	)	
IDAHO POWER COMPANY	)	PETITION TO INTERVENE OF
	)	NORTHWEST AND INTERMOUNTAIN
2017 Integrated Resource Plan	)	POWER PRODUCERS COALITION

---

The Northwest & Intermountain Power Producers Coalition ("NIPPC") 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 the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition  
c/o Robert D. Kahn, Executive Director  
PO Box 504, Mercer  
Island WA 98040  
rkahn@nippc.org

2. Intervenor, NIPPC, 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. NIPPC requests that the names of Robert Kahn and Carl Fink be placed on the official service list for this docket.

4. On June 30, 2017, Idaho Power Corporation ("IPC") filed its 2017 Integrated Resource Plan ("IRP") in this docket.

5. NIPPC is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to

represent the interests of independent power producers and marketers in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

6. NIPPC has a substantial interest in this proceeding, because any Commission decision regarding IPC's 2017 IRP could have a significant impact on the power markets in Oregon and the Pacific Northwest. Independent power producers and electricity service suppliers, including NIPPC's members, recognize that the Commission's process drives resource acquisition decisions and can have a direct effect on utility pricing.

7. NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, including PGE's 2016 IRP, PacifiCorp's 2017 IRP, the Commission's bidding guidelines, and the utilities' most recent requests for proposals to add resources. 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. Finally, NIPPC's interest are not adequately represented by any other party in this proceeding.

8. **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.

Respectfully submitted this 18th day of July, 2017.

*s/Carl Fink*

---

Carl Fink (OSB # 980262)  
Suite 200  
628 SW Chestnut Street  
Portland, OR 97219  
Telephone: (971)266.8940  
CMFINK@Blueplanetlaw.com

Counsel for Northwest and Intermountain  
Power Producers Coalition