

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

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In the Matter of:	)	<b>UE 358</b>
	)	
Portland General Electric Company	)	PETITION TO INTERVENE OF THE
	)	NORTHWEST AND INTERMOUNTAIN
Advice No. 19-04 New Load Direct Access	)	POWER PRODUCERS COALITION

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Pursuant to ORS § 756.525 and OAR § 860-001-0300, the Northwest and Intermountain Power Producers Coalition (“NIPPC”) respectfully petitions to intervene and appear with full party status in this proceeding. In support of this petition to intervene, NIPPC provides the following information:

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. Blue Planet Energy Law and Sanger Law will represent NIPPC in this proceeding. All documents relating to this proceeding should be served on the following persons at the addresses listed below:

Carl Fink  
Blue Planet Energy Law, LLC  
Suite 200  
628 SW Chestnut Street  
Portland, Oregon 97219  
Telephone: 971.266.8940  
CMFINK@Blueplanetlaw.com

Irion A. Sanger  
Sanger Law, PC  
1117 SE 53rd Avenue  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
irion@sanger-law.com

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

4. NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets.<sup>1</sup> A fundamental 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.

5. This proceeding involves Portland General Electric Company's ("PGE") tariff proposal to implement its large New Load Direct Access ("NLDA") program through Schedule 689 and the Company's Advice Filing No. 19-02. Among other things, PGE proposes to introduce new charges for NLDA service called the Resource Adequacy Charge and the Resource Intermittency Charge as well as offer a new proposed Long-Term Energy Option and other terms and conditions applicable for large NLDA service

6. NIPPC was a lead proponent and active in the development of the New Large Load Direct Access program and has special knowledge and expertise that may assist the Commission in resolving the issues in this proceeding.

7. Without the opportunity to intervene herein, NIPPC and its members would be without any means of participation in this proceeding which may have a material impact on its members' business activities in the State of Oregon.

8. NIPPC intends to participate herein as a party in this docket. NIPPC does not intend to file Reply Testimony on July 18, 2019, and will take the record as it stands on that date, but reserves the right to file cross-answering and rebuttal testimony, cross-examine witnesses, call and examine witnesses, and be heard in argument if circumstances warrant. The nature and quality of evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding. Granting NIPPC's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

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<sup>1</sup> A current list of NIPPC members can be found at <http://www.nippc.org/info/members.tpl>.

9. For all reason stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor in this docket, with all rights incumbent to that status. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this seventh day of July, 2019.

*s/Carl Fink*

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One of Counsel for Northwest and  
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