

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of ALLIANCE OF WESTERN ) UM 2024  
ENERGY CONSUMERS, )  
 ) PETITION TO INTERVENE  
Investigation into Long-Term Direct Access ) OF CALPINE ENERGY  
Programs ) 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, for leave to intervene herein and to appear and participate herein as a party, and as ground 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  
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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. 27<sup>th</sup> Street  
Boise, Idaho 83702  
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greg@richardsonadams.com  
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3. Copies of all pleadings, discovery, Commission orders and other documents should be provided to the following persons:

Gregory M. Adams  
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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 recent proceedings related to retail direct access, including the investigation and rulemaking that created the new large load direct access program. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and customers currently participating in 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 27th day of June 2019.

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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Of Attorneys for Calpine Energy  
Solutions, LLC