

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2024

In the Matter of ALLIANCE OF
WESTERN ENERGY CONSUMERS,

Investigation into Long-Term Direct
Access Programs

PETITION TO INTERVENE

NORTHWEST POWER AND
CONSERVATION COUNCIL

The Northwest Power and Conservation Council (Council) hereby petitions the Public Utility Commission of Oregon (Commission) to intervene in this docket and participate in this proceeding pursuant to ORS 756.525 and OAR 860-001-0300. In support of this petition, the Council provides the following:

1. The contact information for the Council to be included on the service list is:

Northwest Power and Conservation Council
Attn: Ben Kujala, Director of Power Planning
851 SW 6th Ave., Suite 1100
Portland, Oregon 97204
bkujala@nwcouncil.org
(503)222-5161

2. The Council will also be represented in this proceeding by:

John Shurts, General Counsel (OSB No. 87144)
Andrea Goodwin, Senior Counsel (OSB No. 114028)
Northwest Power and Conservation Council
851 SW 6th Ave., Suite 1100
Portland, Oregon 97204
jshurts@nwcouncil.org
agoodwin@nwcouncil.org
(503) 222-5161

The Council requests that Mr. Shurts and Ms. Goodwin also be included on the service list for this proceeding.

3. The Council is an interstate compact agency formed in 1981 by the states of Idaho, Montana, Oregon and Washington as authorized by Congress in the Pacific Northwest Electric Power Planning and Conservation Act of 1980. The Northwest Power Act charged the Council with developing a regional conservation and generation power plan, a 20-year plan that the Act requires the Council to review and update every five years. One of the purposes of the Northwest Power Act and of the Council's power plan is "to assure the Pacific Northwest an adequate, efficient, economical and reliable power supply." The Council's most recent power plan is the Seventh Northwest Power Plan, adopted in 2016. <https://www.nwcouncil.org/energy/7th-northwest-power-plan/about-seventh-power-plan>. The Council has begun its review for the next power plan, what will be the 2021 Northwest Power Plan. <https://www.nwcouncil.org/2021-northwest-power-plan>.

4. The nature and extent of the Council's interest in this proceeding is focused on issues related to resource adequacy. Besides the periodic power plans and power planning process, the Council has also established a Resource Adequacy Advisory Committee. <https://www.nwcouncil.org/energy/energy-advisory-committees/resource-adequacy-advisory-committee>. With the help of this committee, each year the Council assesses the adequacy of the region's power supply five years into the future. The Council also adopted, in 2011, a resource adequacy standard for the region (a 5% Loss of Load Probability standard) to provide an early warning should resource development not keep pace with needs. The Council just completed the Resource Adequacy assessment for 2024. [Resource Adequacy 2024 Executive Summary October 2019](#); *see also* [Resource Adequacy 2024 Council Presentation Sept 2019](#). The assessment indicates the region faces a significant resource adequacy issue, largely related to the schedule of coal plant retirements in the region, a problem the Council, the region's utilities, the regulatory entities and others will be working to resolve in the next few years.

5. Thus, the Council is interested in this proceeding as it relates to the topic of regional resource adequacy and to the Council's resource adequacy assessments and power planning efforts. The Council's interest is in making sure the Commission and the parties

understand both the nature of the resource adequacy issues the region faces as well as paths that are available for solving those issues. The Council intends to participate in this capacity only; we do not intend to express an opinion or provide information on the appropriate policies for long-term direct access programs.

6. Based on the information provided above, the Council respectfully requests the Commission grant this petition to allow the Council to participate in this proceeding as an intervenor. The Council has a direct interest in this proceeding that will not be represented by any other party. The Council has knowledge and expertise regarding resource adequacy that will assist the Commission in understanding and resolving any resource adequacy issues or questions in this proceeding. The Council's participation in this proceeding will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 11th day of October 2019.

/s/ John Shurts

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