

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

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In the Matter of:	)	<b>UM 2024</b>
	)	
ALLIANCED OF WESTERN ENERGY CONSUMERS	)	PETITION TO INTERVENE OF THE NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION
	)	
INVESTIGATION INTO LONG-TERM DIRECT ACCESS PROGRAMS	)	

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Pursuant to ORS § 756.525 and OAR § 860-001-0300 and the Notice of Prehearing Conference issued in this Docket September 27, 2019, 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 Carol Opatrny, Executive Director  
18509 NE Cedar Drive  
Battle Ground,  
WA. 98604  
[ccopat@e-z.net](mailto:ccopat@e-z.net)

2. Blue Planet Energy Law, LLC 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

3. NIPPC requests that the names of Carol Opatrny and Carl Fink 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. By Order No. 19-271,<sup>2</sup> the Oregon Public Utility Commission (“**Commission**”) granted a petition by the Alliance of Western Energy Consumers (“**AWEC**”) and opened a general investigation into long-term direct access programs in Oregon.

6. NIPPC has been an active proponent for direct access and has been active before the Commission in many dockets relating to direct access and related policies. NIPPC members include Electricity Service Suppliers that provide direct access service. NIPPC 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, including filing testimony, calling and examining or cross-examining witnesses, participating in settlement discussions 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

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

<sup>2</sup> OPUC Docket No. UM 2024, *Petition for Investigation Into Long-Term Direct Access Programs*, Order No. 19-271 (August 15, 2019).

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.

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 October, 2019.

*s/Carl Fink*

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One of Counsel for Northwest and  
Intermountain Power Producers Coalition