

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2166**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

2021 All-Source Request for Proposals.

**PETITION TO INTERVENE OF SWAN  
LAKE NORTH HYDRO, LLC AND FFP  
PROJECT 101, LLC**

Swan Lake North Hydro, LLC and FFP Project 101, LLC<sup>1</sup> (together, the “Projects”), respectfully petition to intervene in this proceeding pursuant to ORS 756.525 and OAR 860-001-0300. In support of this petition, the Projects state as follows:

1. The contact information for the Projects is:

Rye Development LLC  
Attn: Michael Rooney  
830 NE Holladay St.  
Portland, OR 97232  
[michael@ryedevelopment.com](mailto:michael@ryedevelopment.com)

2. The names and addresses of the persons to be included on the official service list in this docket are:

Michael Rooney  
Vice President, Rye Development  
830 NE Holladay St.  
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(412) 400-4186  
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<sup>1</sup> FFP Project 101, LLC is developing the Goldendale Energy Storage Project, as noted in the Draft License Application submitted to the Federal Energy Regulatory Commission in Docket No. P-14861. While FFP Project 101, LLC is the entity developing Goldendale, and therefore is the appropriate intervenor in this proceeding, FFP Project 101, LLC may be referred to simply as “Goldendale” in this or subsequent filings with the Commission.

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3. The Projects are two, closed-loop pumped storage projects, one of which is located in Oregon. The Projects are actively engaged in discussions with various offtakers, including utilities located in Oregon and subject to the Public Utility Commission of Oregon (“Commission”).

4. The Projects have an interest in resource planning and ensuring that Portland General Electric’s request for proposals process appropriately considers, and fairly evaluates, energy storage projects, including pumped hydro storage. Any Commission decision regarding Portland General Electric’s 2021 All-Source Request for Proposals could have a significant impact on power markets in Oregon, including the viability of pumped hydro projects.

5. The Projects intend to actively participate in this proceeding and raise issues that are pertinent to the proceeding. Furthermore, no other party can adequately represent the interests of the Projects in this proceeding. As part of its participation in this proceeding, the Projects will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

6. The Projects have special knowledge and expertise that would assist the Commission in resolving the issues in this proceeding. Because these Projects are among the most commercially ready and viable pumped storage projects in the region, they are able to provide a unique and important voice to this proceeding.

7. Based on the information provided above, and in compliance with the Commission’s rules of procedure, the Projects request to participate in this docket as intervenors.

Dated this 30<sup>th</sup> day of September, 2021.

Respectfully submitted,

/s/ Michael Rooney

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