

**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
NEWSUN ENERGY LLC

NewSun Energy (NewSun) respectfully petitions to intervene in this proceeding pursuant to Oregon Administrative Rule 860-001-0300 and ORS 756.525. In support of this Petition, NewSun provides the following:

The name and address of the Company is:

NewSun Energy LLC
2033 E. Speedway Blvd, Suite 200
Tucson, AZ 85719

The petitioner will be represented by counsel in this proceeding. The names and addresses of the persons to be included on the official service list in this proceeding are:

Jacob H. Stephens
CEO and Founder
NewSun Energy LLC
2033 E. Speedway Blvd, Suite 200
Tucson, AZ 85719
Cell: 520-981-7303
Email: jstephens@newsunenergy.net

Marie P. Barlow
In-House Counsel, Policy & Regulatory Affairs
NewSun Energy LLC
4207 SE Woodstock, #368
Portland, OR 97206
Office: 503-420-7734
Cell: 509-389-4847
Email: mbarlow@newsunenergy.net

Brittany Andrus
Consultant
c/o NewSun Energy LLC
4207 SE Woodstock, #368
Portland, OR 97206
Cell: 503-515-2760
Email: andruspdx@gmail.com

NewSun is a Delaware limited liability company that invests in and has and manages affiliates engaged in the development of renewable energy facilities, including small power production qualifying facilities and related activities in the Pacific Northwest. NewSun is seeking intervention on its own behalf and not as a member of a trade group or other organization.

NewSun has special knowledge or expertise that may assist the Commission in resolving the issues in this proceeding. NewSun has experience with renewable and clean energy standards, energy and capacity values, interconnection, transmission, and resource planning. The outcome of this docket could have a direct impact on NewSun's business. NewSun has participated in other regulatory dockets before the Commission including regarding integrated resource planning, requests for proposals, Public Utility Regulatory Policies Act implementation, avoided costs, interconnection, capacity valuation and resource adequacy. NewSun has an interest in resource procurement and ensuring that Portland General Electric Company's procurement process is handled fairly regarding all sources of generation. NewSun anticipates participating to the extent necessary to ensure its interests are protected. NewSun's interests are not adequately represented by any other party, and its participation will assist the Commission in resolving issues.

Based on the information provided above in compliance with the Commission's rules of procedures, NewSun requests approval to participate in these proceedings as an intervenor. NewSun's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

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NewSun Energy LLC therefore respectfully requests that the Commission grant this
Petition to Intervene.

Dated this 14th day of October 2021.

Respectfully submitted,

/s/ Marie P. Barlow

Marie P. Barlow
In-House Counsel, Policy & Regulatory Affairs
NewSun Energy LLC
4207 SE Woodstock, #368
Portland, OR 97206
Telephone: (503) 420-7734
mbarlow@newsunenergy.net