

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2210**

In the Matter of  
  
IDAHO POWER COMPANY

Application for Waiver of Competitive  
Bidding Rules

NORTHWEST & INTERMOUNTAIN  
POWER PRODUCERS COALITION  
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Northwest & Intermountain Power Producers Coalition (“NIPPC”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, NIPPC provides the following information:

The name and address of NIPPC is:

Northwest & Intermountain Power Producers Coalition  
Spencer Gray  
Executive Director  
P.O. Box 504  
Mercer Island, WA 98040  
Email: sgray@nippc.org

Sanger Law, PC and Richardson Adams, PLLC will represent NIPPC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.<sup>1</sup> The 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.

NIPPC has a substantial interest in this proceeding in particular because Idaho Power Company (“Idaho Power”) proposes to eliminate the previously approved competitive bidding rules for its acquisition of the major generation resources under consideration in this docket. NIPPC was the petitioner that requested that the Commission adopt competitive bidding guidelines in UM 1182 and was an active participant in the Commission’s administrative rulemaking in AR 600 that adopted the current competitive bidding rules. Thus, NIPPC has a direct interest in Idaho Power’s request to waive the rules. Additionally, given the opportunity, independent power

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<sup>1</sup> NIPPC’s members include but are not limited to: Calpine Corp, Constellation Exelon, Cycle, DG Energy Partners, Direct Energy, Ecoplexus, EDF Renewable Energy, EDP Renewables, Invenergy LLC, Morgan Stanley, NewSun Energy, NextEra Energy, Obsidian Renewables, Perennial Power Holdings, Rye Development, Shell Energy North America, Sierra Pacific Industries, TransAlta Energy Marketing, and Tyr Energy.

producers, including NIPPC members, may participate in Idaho Power's competitive solicitations at issue in this docket, as well as future solicitations, and NIPPC's participation in this proceeding can help ensure that such processes are reasonable, fair, and balanced. NIPPC's interests are not adequately represented by any other party in this proceeding.

NIPPC has participated in numerous regulatory proceedings related to request for proposals, bidding guidelines, and competitive markets. NIPPC's legal counsel have participated in numerous Commission proceedings and investigations regarding Oregon's investor-owned utilities, including Idaho Power. NIPPC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, NIPPC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 12th day of January 2022.

Respectfully submitted,



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Of Attorneys for the Northwest & Intermountain  
Power Producers Coalition