

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2274

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 All-Source Request for Proposals,
Request for Partial Waiver of
Competitive Bidding Rules.

NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS
COALITION'S 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.¹ 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 because Portland General Electric Company's ("PGE's") Request for Proposal ("RFP") and request to waive certain competitive bidding rules could have a significant impact on PGE's next major resource acquisition. Independent power producers and electricity service suppliers, including NIPPC members, may participate in PGE's next RFP, and this proceeding can

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

help ensure that the process is 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 RFPs, competitive bidding rules, and competitive markets. NIPPC's legal counsel have participated in numerous Commission proceedings and investigations regarding Oregon's investor-owned utilities, including PGE. 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.

RESPECTFULLY SUBMITTED this 8th day of February, 2023.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams
Gregory M. Adams (OSB No. 101779)

Of Attorneys for the Northwest &
Intermountain Power Producers Coalition