BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 77

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2021 Integrated Resource Plan

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, Washington 98040 Telephone: (206) 236-7200 sgray@nippc.org

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

Spencer Gray Executive Director Northwest & Intermountain Power Producers Coalition P.O. Box 504 Mercer Island, Washington 98040 Telephone: (206) 236-7200 sgray@nippc.org Irion Sanger Sanger Law, PC 4031 SE Hawthorne Blvd. Portland, OR 97214 Telephone: (503) 756-7533 Fax: (503) 334-2235 irion@sanger-law.com

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NIPPC is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of independent power producers and marketers 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 any Commission decision regarding PacifiCorp's 2021 integrated resource plan ("IRP") could have a significant impact on the power markets in Oregon. Independent power producers and electricity service suppliers, including NIPPC's members, recognize that the Commission's process drives resource acquisition decisions and can have a direct effect on utility pricing. Also, PacifiCorp has filed a new request for proposal, and is therefore particularly interested in PacifiCorp's stated resource acquisition strategy and the Commission's acknowledgement of the IRP.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, including PacifiCorp's 2017 IRP, the Commission's bidding

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guidelines, and the utilities' most recent requests for proposals to add resources. 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. Finally, NIPPC's interest are not adequately represented by any other party in 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 24th day of September 2021.

Respectfully submitted,

Irion Sanger Sanger Law, PC 4031 SE Hawthorne Blvd. Portland, OR 97214 Telephone: (503) 756-7533 Fax: (503) 334-2235 irion@sanger-law.com

Attorney for the Northwest & Intermountain Power Producers Coalition