

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP,)	UE 352
DBA: PACIFIC POWER,)	
)	UNOPPOSED PETITION TO
)	INTERVENE OF CALPINE
2019 Renewable Adjustment Clause)	ENERGY SOLUTIONS, LLC
)	
)	
)	

Calpine Energy Solutions, LLC (“Calpine Solutions”) hereby petitions the Public Utility Commission of Oregon (“OPUC” or “Commission”), pursuant to ORS 756.525 and OAR 860-001-0300, to intervene and appear and participate as a party herein, and as ground therefore states as follows:

1. The name and address of this Intervenor is:

Calpine Energy Solutions, LLC
Attn: Greg Bass
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 684-8355
greg.bass@calpinesolutions.com

2. Calpine Solutions will be represented in this docket by:

Gregory M. Adams (OSB No. 101779)
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Boise, Idaho 83702
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greg@richardsonadams.com
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3. Copies of all pleadings, discovery, Commission orders and other documents

should be provided to the following persons:

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4. Calpine Solutions is a national provider of retail energy services, including in the State of Oregon and is a certified electricity service supplier (“ESS”) under Oregon law and regulations. *See* Order No. 16-479; Order No. 10-453; Order No. 07-075; Order No. 02-133.

5. Calpine Solutions and its predecessor entities, Noble Americas Energy Solutions LLC and Sempra Energy Solutions LLC, have actively participated in numerous proceedings related to retail direct access, including OPUC dockets UE 216, UE 227, UE 236, UE 245, UE 262, UE 264, UE 267, UE 287, UE 296, UE 307, UE 308, UE 313, UE 319, UE 323, UE 339, UM 1587, UM 1390, UM 1837 and DR 49. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and customers currently participating in direct access and will also therefore affect Calpine Solutions’ ability to provide

retail electricity services in the State of Oregon. Calpine Solutions therefore claims a direct and substantial interest in this proceeding.

6. Calpine Solutions intends to participate herein as a party, and if necessary, to introduce evidence, call and examine witnesses, cross-examine witnesses, and be heard in argument. The nature and quality of evidence and argument which Calpine Solutions will introduce is dependent upon the nature and effect of other evidence in this proceeding.

7. Without the opportunity to intervene herein, Calpine Solutions would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

8. Counsel for Calpine Solutions contacted counsel for the other parties to this proceeding, OPUC Staff, PacifiCorp, the Citizens Utility Board of Oregon, and the Alliance for Western Energy Consumers, regarding whether any of those parties intend to object to intervention of Calpine Solutions in this proceeding. Each of those parties communicated that it does not object to the intervention of Calpine Solutions in this proceeding. Therefore, this petition is unopposed and may be resolved without awaiting for responses from other parties.

WHEREFORE, Calpine Energy Solutions, LLC respectfully requests that this Commission grant its Unopposed Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 4th day of February 2019.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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