

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of:)	UE 400
)	
PACIFICORP, dba PACIFIC POWER)	PETITION TO INTERVENE OF THE
)	NORTHWEST AND INTERMOUNTAIN
)	POWER PRODUCERS COALITION
2023 Transition Adjustment Mechanism)	

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

1. The name and address of the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition
P.O Box 504
Mercer Island, WA. 98604

2. Blue Planet Energy Law, LLC will represent NIPPC in this proceeding.

3. All documents relating to this proceeding should be served on the following persons at the addresses listed below, and NIPPC requests that the names of Spencer Gray and Carl Fink be placed on the official service list for this docket:

Northwest and Intermountain Power
Producers Coalition
c/o **Spencer Gray**, Executive Director
P.O Box 504
Mercer Island, WA. 98604
SGray@NIPPC.org

Carl Fink
Blue Planet Energy Law, LLC
628 SW Chestnut Street
Portland, Oregon 97219
Telephone: 971.266.8940
CMFINK@Blueplanetlaw.com

4. NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets.¹ A fundamental purpose of NIPPC is to represent the interests of its members in ensuring a fair and open competitive electric power market in the Pacific Northwest, including ensuring that rates paid by customers of electricity service suppliers for costs incurred by investor-owned utilities are fair and appropriate.

5. On March 1, 2022, PacifiCorp filed its 2023 Transition Adjustment Mechanism (“TAM”). PacifiCorp’s TAM will substantially and directly affect NIPPC’s members that serve retail markets within PacifiCorp’s service territory through direct access as well as those of NIPPC’s members who develop electric generation and transmission projects in the Pacific Northwest. NIPPC requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s TAM and related rates and programs.

6. NIPPC has been an active proponent for direct access and independent power generation and has been active before the Commission in many dockets relating to direct access and power generation policies and utility rates. NIPPC members include Electricity Service Suppliers that provide direct access service as well as electric generation and storage providers. NIPPC has special knowledge and expertise that may assist the Commission in resolving the issues in this proceeding.

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

8. NIPPC intends to participate herein as a party in this docket, including filing testimony, calling and examining or cross-examining witnesses, participating in settlement discussions and be heard in argument if circumstances warrant. The nature and quality of

¹ A current list of NIPPC members can be found at <http://www.nippc.org/info/members.tpl>.

evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding. Granting NIPPC's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

9. For all reason stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor in this docket, with all rights incumbent to that status. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 21th day of March, 2022.

s/ Carl Fink

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Intermountain Power Producers Coalition