## **BEFORE THE**

## PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of	)	UE 435
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF
COMPANY,	)	CALPINE ENERGY SOLUTIONS,
	)	LLC
Request for a General Rate Revision.	)	
	)	

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) Peter J. Richardson (OSB No. 066687) Richardson Adams, PLLC 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 greg@richardsonadams.com peter@richardsonadams.com 3. Copies of all pleadings, discovery, Commission orders and other documents

should be provided to the following persons:

Gregory M. Adams Richardson Adams, PLLC 515 N 27<sup>th</sup> St. Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 greg@richardsonadams.com

Kevin C. Higgins Principal Energy Strategies, LLC 215 South State Street, Suite 200 Salt Lake City, Utah 84111 Telephone: (801) 355-4365 Fax: (801) 521-9142 khiggins@energystrat.com Greg Bass Calpine Energy Solutions, LLC 401 West A Street, Suite 500 San Diego, California 92101 Telephone: (619) 684-8199 Fax: (619) 684-8355 greg.bass@calpinesolutions.com

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 Commission proceedings related to retail direct access. 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.

WHEREFORE, Calpine Energy Solutions, LLC respectfully requests that this Commission grant its 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 5th day of March, 2024

## RICHARDSON ADAMS, PLLC

<u>/s/ Gregory M. Adams</u> Gregory M. Adams (OSB No.101779) 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 greg@richardsonadams.com

Of Attorneys for Calpine Energy Solutions, LLC