

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

UM 1276

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF OREGON)
)
Staff's request to open an investigation)
regarding performance-based ratemaking)
mechanisms to address potential build vs. buy)
bias)
_____)

**NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION
PETITION TO INTERVENE AS A PARTY**

Pursuant to the Commission's Rules, OAR 860-013-0021, and the Administrative Law Judge's ruling in this docket, the Northwest & Intermountain Power Producers Coalition ("NIPPC") petitions to intervene as a party. In support of this Petition, NIPPC states as follows:

1. The name and address of the Petitioners are as follows:

Robert D. Kahn, Executive Director
NIPPC
7900 SE 28th Street, Suite 200
Mercer Island, WA 98040-2970
Telephone: 206.236.7200
Email: rkahn@nippc.org

2. The name and address of Petitioner's attorney is as follows:

Susan K. Ackerman, Attorney
P.O. Box 10207
Portland, Oregon 97296-0207
Telephone: 503.297.2392
Email: susan.k.ackerman@comcast.net

3. NIPPC is a trade association whose members and associate members include independent power producers¹ active in the Pacific Northwest and Western energy markets. 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.

4. NIPPC has a substantial interest in this docket as its members desire to advance competitive resource procurement policies in Oregon in the belief that such policies provide cost savings and other benefits for Oregon's economy and its electricity consumers. Whether there are performance-based ratemaking methods that can eliminate a build v. buy bias is of interest to NIPPC because such a mechanism would help to advance competitive procurement in Oregon. Toward that end, NIPPC has previously actively participated in Docket Nos. UM 1066, UM 1182, LC 33, and UM 1208. NIPPC's interest in this docket is thus substantial and will not be represented by any other party.

5. NIPPC requests that the names of Robert Kahn and Susan Ackerman be placed on the official service list in this docket.

7. NIPPC waives paper service of documents.

6. For all the reasons stated herein, NIPPC asks that its request to intervene as a party in this docket be granted.

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¹ Members include BP Energy, Calpine, Constellation Control and Dispatch, EPCOR, National Energy Systems Co., Suez Energy North America, TransAlta, Transcanada, Sea Breeze Power Corp., Wallula Resource Recovery.

DATED this 13th day of October, 2006.

Attorney for NIPPC:

/s/ Susan K. Ackerman

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October 13, 2006

VIA Electronic Mail & U.S. Mail

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

Re: UM 1276; NIPPC Petition to Intervene

Enclosed is an original of NIPPC's Petition to Intervene in this docket. A hard copy of these comments will follow in the U.S. Mail.

Please call me if you have any questions.

Very truly yours,

/s/ Susan K. Ackerman

Susan K. Ackerman
Attorney for NIPPC

Enclosures

Certificate of Service

I certify that I have this day served the foregoing document upon all parties of record in UM 1276 by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to all parties or attorneys of parties, on the service list compiled by the OPUC.

Dated this 13th day of October, 2006.

/s/ Susan K. Ackerman
Susan K. Ackerman
Attorney for NIPPC
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Portland, Oregon 97296
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