## BEFORE THE

## PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of Voluntary Renewable Energy	)	UM 1690
Tariffs for Non-Residential Customers	)	
	)	PETITION TO INTERVENE
	)	OF CALPINE ENERGY
	)	SOLUTIONS, LLC

Calpine Energy Solutions, LLC ("Calpine Solutions") hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to ORS 756.525 and OAR 860-001-0300(2), for leave to intervene herein and to appear and participate herein as a party, and as grounds 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

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CALPINE ENERGY SOLUTIONS, LLC PETITION TO INTERVENE UM 1690 PAGE 1 3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the following:

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

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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

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Greg Bass, Regulatory Director Calpine Energy Solutions LLC 401 West A Street, Suite 500 San Diego, California 92101 Telephone: (619) 684-8199 Fax: (619) 684-8355

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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 Commission 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 323, UM 1587, UM 1690, UM 1837 and DR 49. The outcome of this proceeding will affect the transition adjustment rates charged to customer's eligible for 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.

CALPINE ENERGY SOLUTIONS, LLC PETITION TO INTERVENE UM 1690 PAGE 2 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 14th day of May 2018.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Gregory M. Adams (OSB No. 101779)

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Of Attorneys for Calpine Energy Solutions,

LLC

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