

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1854**

| | | |
|---|---|-----------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC |) | NORTHWEST AND |
| COMPANY |) | INTERMOUNTAIN POWER |
| |) | PRODUCERS COALITION'S |
| Application to Lower the Standard Price and |) | PETITION TO INTERVENE |
| Standard Contract Eligibility Cap for Solar |) | |
| <u>Qualifying Facilities</u> |) | |

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Northwest and Intermountain Power Producers Coalition ("NIPPC") petitions the Oregon Public Utility Commission (the "Commission") to intervene and appear with full party status. In support of this petition to intervene, NIPPC provides the following information:

The name and address of NIPPC is:

Northwest and Intermountain Power Producers Coalition
Robert D. Kahn
Executive Director
P.O. Box 504
Mercer Island, Washington 98040
Telephone: (206) 236-7200
E-Mail: rkahn@nippc.org

Sanger Law, PC will represent NIPPC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Robert Kahn
Executive Director
Northwest and Intermountain
Power Producers Coalition
P.O. Box 504
Mercer Island, Washington 98040
Telephone: (206) 236-7200
rkahn@nippc.org

Irion A. Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (971) 202-7103
Fax: (503) 334-2235
irion@sanger-law.com

NIPPC is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of independent power producers and marketers in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.

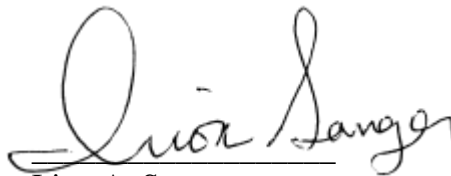
PGE's application could have a substantial impact on NIPPC's members, many of which sell power or are attempting to sell power to PGE as qualifying facilities. PGE has requested that the Commission lower the standard contract eligibility cap, and impose a permanent cap on eligibility for standard contracts and rates for any one owner. PGE's proposals could result in a significant change in the Commission's implementation of the Public Utility Regulatory Policies Act ("PURPA") for both PGE and other Oregon investor owned utilities, and can harm both independent power producers and ratepayers.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, renewable energy, and diversity of generation ownership. NIPPC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, NIPPC's interest are not adequately represented by any other party in this proceeding.

WHEREFORE, NIPPC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 11th day of July 2017.

Respectfully submitted,

A handwritten signature in black ink, reading "Irion A. Sanger". The signature is written in a cursive style with a large, looped initial "I".

Irion A. Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: (971)202-7103
Fax: (503)334-2235
irion@sanger-law.com

Attorney for the Northwest and Intermountain
Power Producers Coalition