

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1856

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	NORTHWEST AND
COMPANY,)	INTERMOUNTAIN POWER
)	PRODUCERS COALITION'S
Draft Storage Potential Evaluation)	PETITION TO INTERVENE
_____)	

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
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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:

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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.

NIPPC has a substantial interest in this proceeding, because any Commission decision could have a significant impact on the power markets in Oregon. Independent power producers and electricity service suppliers, including NIPPC's members, recognize that storage will have a profound impact on the utility's resource acquisition decisions going forward, and the Commission's decisions in this docket will shape future storage policy.

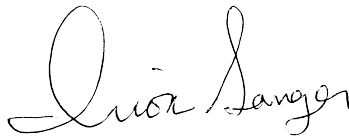
NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, including the utilities' most recent integrated resource planning and previous requests for proposals, as well as the Commission's competitive bidding guidelines and new load investigations. NIPPC's intervention 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 29th day of November 2017.

Respectfully submitted,



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