BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1892

| In the Matter of |) | |
|---------------------------------------|---|-----------------------|
| |) | NORTHWEST AND |
| PORTLAND GENERAL ELECTRIC |) | INTERMOUNTAIN POWER |
| COMPANY |) | PRODUCERS COALITION'S |
| |) | PETITION TO INTERVENE |
| Application for Waiver of Competitive |) | |
| Bidding Guidelines |) | |

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 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
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P.O. Box 504

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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.

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NIPPC has a substantial interest in this proceeding, because any Commission decision could impact the Commission's policies regarding the competitive procurement of electricity and wholesale electric generation markets. The Commission adopted the original competitive bidding guidelines based upon a request by NIPPC, and NIPPC has been an active participant is all recent Oregon proceedings regarding competitive bidding guidelines. NIPPC's interests are not be adequately represented by any other party in this proceeding.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, including the Commission's proceedings regarding direct access.

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 31st day of August 2017.

Respectfully submitted,

Irion Sanger

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