## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 2001

In the Matter of	)	
	)	NORTHWEST AND
PUBLIC UTILITY COMMISSION OF	)	INTERMOUNTAIN POWER
OREGON,	)	PRODUCERS COALITION
	)	PETITION TO INTERVENE
Investigation Into Interim PURPA Action	)	

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 Thompson, 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 PO Box 504 Mercer Island, WA 98040 Telephone: (206) 236- 7200 rkahn@nippc.org Irion Sanger Sanger Thompson, PC 1041 SE 58th Place Portland, OR 97215 Telephone: (503) 756-7533 Fax: (503) 334-2235 irion@sanger-law.com

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NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.<sup>1</sup> 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.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. 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.

<sup>&</sup>lt;sup>1</sup> NIPPC's members include: Calpine, Capital Power, Constellation Energy, Cypress Creek Renewables, Direct Energy, EDF Renewables, EDP Renewables, Invenergy, KapStone Paper, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power, Shell Energy North America, Sierra Pacific Industries, and TransAlta Energy Marketing.

Finally, NIPPC's interest is 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 7th day of June 2019.

Respectfully submitted,

Irion Sanger Sanger Thompson, PC 1041 SE 58th Place Portland, OR 97215 Telephone: (503)756-7533 Fax: (503)334-2235 irion@sanger-law.com

Of Attorneys for the Northwest and Intermountain Power Producers Coalition