

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UM 2024

In the Matter of PUBLIC UTILITY
COMMISSION OF OREGON

AWEC's Investigation Into Long-Term
Direct Access Programs

PETITION TO INTERVENE OF
BROOKFIELD RENEWABLE TRADING AND
MARKETING LP

BROOKFIELD RENEWABLE TRADING AND MARKETING LP

Stephen Greenleaf
Senior Director of Regulatory Affairs and Policy, Western U.S.
Brookfield Renewable Trading and Marketing LP
1568 Oglala Street
South Lake Tahoe, CA 96150
(916) 802-5420

Dated: November 18, 2021

Steve.Greenleaf@brookfieldrenewable.com

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UM 2024

In the Matter of PUBLIC UTILITY
COMMISSION OF OREGON

AWEC's Investigation Into Long-Term
Direct Access Programs

PETITION TO INTERVENE OF
BROOKFIELD RENEWABLE TRADING AND
MARKETING LP

Brookfield Renewable Trading and Marketing LP ("BRTM) hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to Oregon Revised Statutes ("ORS") 756.525 and Oregon Administrative Rules ("OAR") 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as ground therefore states as follows:

1. The name and address of this Intervenor is:

Brookfield Renewable Trading and Marketing LP
200 Liberty Street, 14th FL,
New York, NY, 10281

2. BRTM will be represented in this docket by:

Stephen T. Greenleaf
Senior Director, Regulatory Affairs & Policy, Western U.S.
Brookfield Renewable Trading and Marketing LP
Oglala Street, South Lake Tahoe, CA 96150
Telephone: 916.802.5420
Steve.Greenleaf@brookfieldrenewable.com

Hayley K. Siltanen
Laura K. Granier
Austin W. Jensen
Holland & Hart LLP
5441 Kietzke Lane, Suite 200
Reno, NV 89511
Telephone: (775) 327-3089
hksiltanen@hollandhart.com
lkgranier@hollandhart.com
awjensen@hollandhart.com

3. Copies of all pleadings, discovery, Commission orders and other documents should be provided to the following persons:

Stephen T. Greenleaf
Senior Director, Regulatory Affairs & Policy, Western U.S.
Brookfield Renewable Trading and Marketing LP
Oglala Street, South Lake Tahoe, CA 96150
T 916.802.5420
Steve.Greenleaf@brookfieldrenewable.com

Hayley K. Siltanen
Laura K. Granier
Austin W. Jensen
Holland & Hart LLP
5441 Kietzke Lane, Suite 200
Reno, NV 89511
Telephone: (775) 327-3089
hksiltanen@hollandhart.com
lkgranier@hollandhart.com
awjensen@hollandhart.com

4. BRTM, a subsidiary of Brookfield Renewable Partners LP (“Brookfield Renewable”), provides energy marketing services and support to power generation facilities owned and operated by its Brookfield Renewable affiliates operating in the United States and Canada. BRTM is authorized by the Federal Energy Regulatory Commission to act as a power marketer engaging in wholesale electricity sales at negotiated, market-based rates throughout the United States, including the larger Western bilateral market.

5. Brookfield Renewable operates one of the world's largest publicly traded renewable power platforms, consisting of approximately 20,500 megawatts (MW) of capacity and 5,956 generating facilities in North America, South America, Europe and Asia. Brookfield Renewable's U.S. platform owns and operates solar, wind, storage and hydroelectric facilities across 34 states. The U.S. platform consists of approximately 200 utility-scale renewable facilities and more than 5,400 distributed energy resource facilities, totaling approximately 8,000 MW in nameplate capacity.

6. Brookfield Renewable Energy Marketing US ("BREMUS"), another subsidiary of Brookfield Renewable, is a registered Electricity Service Supplier ("ESS").¹ BRTM, acting as agent for BREMUS, will procure and schedule the delivery of energy and other necessary products for BREMUS for service to its direct access customers.

7. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and the terms and conditions under which BREMUS, and through its agent, BRTM, may offer direct access service in Oregon. BRTM therefore claims a direct and substantial interest in this proceeding.

8. Without the opportunity to intervene herein, BRTM 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, BRTM respectfully requests that this Commission grant its Petition to Intervene in this proceeding and to appear and participate in all manners as may be necessary and

¹ See Docket No. ES 23 and Order 21-070.

appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in this proceeding.

DATED this 18th day of November, 2021.

/s/ Stephen Greenleaf

Stephen Greenleaf
Senior Director of Regulatory Affairs and Policy, Western U.S.
Brookfield Renewable Trading and Marketing LP
(916) 802-5420
Steve.Greenleaf@brookfieldrenewable.com

/s/ Laura K. Granier

Hayley K. Siltanen (OSB #164825)
Laura K. Granier, pro hac vice forthcoming
Austin W. Jensen, pro hac vice forthcoming
Holland & Hart LLP
5441 Kietzke Lane, Suite 200
Reno, NV 89511
Telephone: (775) 327-3089
hksiltanen@hollandhart.com
lkggranier@hollandhart.com
awjensen@hollandhart.com

ATTORNEYS FOR BRTM