

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	NORTHWEST AND
OREGON,)	INTERMOUNTAIN POWER
)	PRODUCERS COALITION
Investigation into the Treatment of Network)	PETITION TO INTERVENE
<u>Upgrade Costs for 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
Carol Opatrny
Interim Executive Director
18509 NE Cedar Drive
Battle Ground, WA 98604
Tel: 360-666-8510
Email: ccopat@e-z.net

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:

Carol Opatrny
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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.¹ 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's members include independent power producers that are interconnection customers that have and will need to purchase interconnection services from Oregon's utilities. NIPPC represents a broad class of customers, and will focus its efforts in this proceeding on the terms and conditions that utilities impose on interconnection customers as they seek to develop and operate independent power projects in the region.

¹ NIPPC's members include: Calpine, Constellation Energy, Direct Energy, Ecoplexus, EDF Renewable Energy, EDP Renewables, Geronimo Energy, Invenergy LLC, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power Holdings, Shell Energy North America, Sierra Pacific Industries, TLS Capital, and TransAlta Energy Marketing.

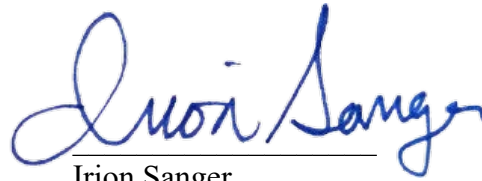
NIPPC is simultaneously filing: 1) a notice of intent to seek intervenor funding through issues fund; 2) request to certify the case as eligible for issue fund grants; and 3) request of be case-certified as a party eligible to receive issue fund grant.

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. 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 16th day of December 2019.

Respectfully submitted,



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