

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

PETITION TO INTERVENE OF
NEWSUN ENERGY LLC

NewSun Energy (“NewSun”) respectfully petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-001-0300 and ORS 756.525. In support of this Petition, NewSun provides the following:

The name and address of the Company is:

NewSun Energy LLC
2033 E. Speedway Blvd, Suite 200
Tucson, AZ 85719

The petitioner will be represented by counsel in this proceeding. The names and addresses of the persons to be included on the official service list in this proceeding are:

Jacob H. Stephens
CEO and Founder
NewSun Energy LLC
2033 E. Speedway Blvd, Suite 200
Tucson, AZ 85719
Cell: 520-981-7303
Email: jstephens@newsunenergy.net

Marie P. Barlow
In-House Counsel, Policy & Regulatory Affairs
NewSun Energy LLC
390 SW Columbia, Suite 120
Bend, OR 97702
Office: 503-420-7734
Cell: 509-389-4847
Email: mbarlow@newsunenergy.net

NewSun is a Delaware limited liability company that successfully interconnected solar projects in Oregon and owns current and prospective solar and storage projects that are or will be interconnection customers of Oregon utilities, both projects that are

qualifying facilities (QFs) under the Public Utility Regulatory Policies Act (PURPA) and projects that are not. NewSun is seeking intervention on its own behalf and not as a member of a trade group or other organization.

NewSun has special knowledge or expertise that may assist the Commission in resolving the issues in this proceeding. Any changes made in this docket are likely to impact projects in Oregon. These outcomes could have a direct impact on NewSun's business. NewSun has participated in other regulatory dockets before the Commission including regarding PURPA interconnection, avoided costs and implementation. NewSun anticipates participating in the proceeding and submitting testimony appropriate to the proceeding and to ensure its interests are protected. NewSun's interests are not adequately represented by any other party, and its participation will assist the Commission in resolving issues.

Based on the information provided above in compliance with the Commission's rules of procedures, NewSun requests approval to participate in these proceedings as an intervenor. NewSun's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

NewSun Energy LLC therefore respectfully requests that the Commission grant this Petition to Intervene.

Dated this 14th day of October, 2020.

Respectfully submitted,
NewSun Energy LLC

/s/ Jacob H. Stephens
Jacob H. Stephens, CEO
NewSun Energy LLC
Jstephens@newsunenergy.net