BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of)	UM 2059
PACIFICORP, dba PACIFIC POWER,)	
Application for Approval of 2020 All-Source)	
Request for Proposal)	

PETITION TO INTERVENE OF INTERMOUNTAIN WIND LLC

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Intermountain Wind LLC

("Intermountain") petitions the Oregon Public Utility Commission to intervene and appear with

full party status. In support of this petition, Intermountain provides the following information:

The name and address of Intermountain is:

Intermountain Wind LLC PO Box 353 Boulder, CO 80306-0353 Paul Martin, President (303) 442-2109 Email: paul@intermountainwindllc.com

The following persons will represent Intermountain in this proceeding:

Paul Martin, President PO Box 353 Boulder, CO 80306-0353 (303) 442-2109 Email: paul@intermountainwindllc.com David D'Alessandro, Harvey Reiter Stinson LLP 1775 Pennsylvania Ave., N.W. Washington, DC 20006 David.dalessandro@stinson.com Harvey.reiter@stinson.com 202-728-3014

Intermountain is a developer of electrical generation and transmission projects. Intermountain Wind is currently developing four wind projects, one solar project, three transmission projects, and associated storage. These projects are located in Wyoming, Colorado, and Idaho. Intermountain has executed large generator interconnection agreements with PacifiCorp and intends to participate in PacifiCorp's 2020 request for proposals. Intermountain therefore has a direct interest in this proceeding that cannot be adequately represented by any other party.

For the foregoing reasons, Intermountain requests that the Commission grant its petition to intervene with full party status in this proceeding, 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 20th day of March, 2020

Respectfully submitted,

s/David D'Alessandro

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Attorneys for Intermountain Wind LLC