

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of:)	UM 2143
)	
PUBLIC UTILITY COMMISSION OF OREGON)	PETITION TO INTERVENE OF THE NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION
)	
Investigation into Resource Adequacy in Oregon)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300, the Northwest and Intermountain Power Producers Coalition (“**NIPPC**”) respectfully petitions to intervene and appear with full party status in this proceeding. In support of this petition to intervene, NIPPC provides the following information:

1. The name and address of the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition
P.O Box 504
Mercer Island, WA. 98604

2. Blue Planet Energy Law, LLC will represent NIPPC in this proceeding.

3. . All documents relating to this proceeding should be served on the following persons at the addresses listed below, and NIPPC requests that the names of Spencer Gray and Carl Fink be placed on the official service list for this docket:

Northwest and Intermountain Power
Producers Coalition
c/o **Spencer Gray**, Executive Director
P.O Box 504
Mercer Island, WA. 98604
SGray@NIPPC.org

Carl Fink
Blue Planet Energy Law, LLC
628 SW Chestnut Street
Portland, Oregon 97219
Telephone: 971.266.8940
CMFINK@Blueplanetlaw.com

4. NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets.¹ A fundamental 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.

5. The Commission initiated the above-captioned investigation on January 12, 2021, following Staff's recommendation. The investigation into resource adequacy could result in a broad set of potential issues and outcomes related to resource adequacy in Oregon and the Pacific Northwest and affect provision of direct access and utility service in Oregon. Staff's statement of scope states that the investigation could determine where a state-level program can fill gaps, ensure reliability, and work cohesively with regional efforts, and may result in an interim solution that may ultimately be different from regional efforts on resource adequacy.

6. NIPPC has been an active proponent for direct access and independent power generation and has been active before the Commission in many dockets relating to direct access and power generation policies. NIPPC members include Electricity Service Suppliers that provide direct access service as well as electric generation and storage providers. NIPPC has special knowledge and expertise that may assist the Commission in resolving the issues in this proceeding.

7. Without the opportunity to intervene herein, NIPPC and its members would be without any means of participation in this proceeding which may have a material impact on its members' business activities in the State of Oregon.

8. NIPPC intends to participate herein as a party in this docket, including filing testimony, calling and examining or cross-examining witnesses, participating in settlement

¹ A current list of NIPPC members can be found at <http://www.nippc.org/info/members.tpl>.

discussions and be heard in argument if circumstances warrant. The nature and quality of evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding. Granting NIPPC's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

9. For all reason stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor in this docket, with all rights incumbent to that status. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 29th day of January, 2021.

s/Carl Fink

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Intermountain Power Producers Coalition