

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2143**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation into Resource Adequacy in  
Oregon.

**SWAN LAKE NORTH HYDRO, LLC AND  
FFP PROJECT 101, LLC PETITION TO  
INTERVENE**

Swan Lake North Hydro, LLC and FFP Project 101, LLC<sup>1</sup> (together, the “Projects”), respectfully petition to intervene in this proceeding pursuant to ORS 756.525 and OAR 860-001-0300. In support of this petition, the Projects state as follows:

1. The contact information for the Projects is:

Rye Development LLC  
Attn: Nathan Sandvig  
220 NW 8<sup>th</sup> Avenue  
Portland, OR 97209  
[nathan@ryedevelopment.com](mailto:nathan@ryedevelopment.com)

2. The names and addresses of the persons to be included on the official service list in this docket are:

Nathan Sandvig  
Vice President, Rye Development  
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(503) 309-2496  
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<sup>1</sup> FFP Project 101, LLC is developing the Goldendale Energy Storage Project, as noted in the Draft License Application submitted to the Federal Energy Regulatory Commission in Docket No. P-14861.

3. The Projects are two, closed-loop pumped storage projects, one of which is located in Oregon. The Projects are actively engaged in discussions with various offtakers, including utilities located in Oregon and subject to the Public Utility Commission of Oregon (“Commission”).

4. The Commission’s initiation of the investigation in this docket could result in a broad set of issues and outcomes related to resource adequacy in Oregon and the Pacific Northwest. The outcome of this proceeding, therefore, will have a substantial and direct effect on the Projects, as they expect to provide significant capacity and resource adequacy to Oregon utilities and the Pacific Northwest region, generally.

5. The Projects intend to actively participate in this proceeding and raise issues that are pertinent to the proceeding. Furthermore, no other party can adequately represent the interests of the Projects in this proceeding. As part of its participation in this proceeding, the Projects will not unreasonably burden the issues, burden the record, or unreasonably delay the proceeding.

6. The Projects have special knowledge and expertise that would assist the Commission in resolving the issues in this proceeding. The Projects are grid-scale, environmentally friendly pumped storage projects, which will provide a unique and important voice to this proceeding.

7. Based on the information provided above, and in compliance with the Commission’s rules of procedure, the Projects request to participate in this docket as intervenors.

Dated this 20<sup>th</sup> day of January, 2021.

Respectfully submitted,

*/s/ Chris Zentz* \_\_\_\_\_

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