## BEFORE THE

## PUBLIC UTILITY COMMISSION OF OREGON

| In the Matter of PUBLIC UTILITY | ) UM 2143 |
| :--- | :--- |
| COMMISSION OF OREGON | ) |
|  | PETITION TO INTERVENE |
| Investigation Into Resource Adequacy in | $)$ OF CALPINE ENERGY |
| Oregon | ) SOLUTIONS, LLC |
|  |  |

Calpine Energy Solutions, LLC ("Calpine Solutions") hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to ORS 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as ground therefore states as follows:

1. The name and address of this Intervenor is:

Calpine Energy Solutions, LLC
Attn: Greg Bass
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 684-8355
greg.bass@calpinesolutions.com
2. Calpine Solutions will be represented in this docket by:

Gregory M. Adams (OSB No. 101779)
Peter J. Richardson (OSB No. 066687)
Richardson Adams, PLLC
515 N. $27^{\text {th }}$ Street
Boise, Idaho 83702
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3. Copies of all pleadings, discovery, Commission orders and other documents should be provided to the following persons:

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4. Calpine Solutions is a national provider of retail energy services, including in the State of Oregon and is a certified electricity service supplier ("ESS") under Oregon law and regulations. See Order No. 16-479; Order No. 10-453; Order No. 07-075; Order No. 02-133.
5. Calpine Solutions and its predecessor entities, Noble Americas Energy Solutions LLC and Sempra Energy Solutions LLC, have actively participated in numerous recent proceedings related to retail direct access. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and the terms and conditions under which Calpine Solutions may offer direct access service in Oregon. Calpine Solutions therefore claims a direct and substantial interest in this proceeding.
6. Calpine Solutions intends to participate herein as a party, and if necessary, to introduce evidence, call and examine witnesses, cross-examine witnesses, and be heard in argument. The nature and quality of evidence and argument which Calpine Solutions will introduce is dependent upon the nature and effect of other evidence in this proceeding.
7. Without the opportunity to intervene herein, Calpine Solutions would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

WHEREFORE, Calpine Energy Solutions, LLC respectfully requests that this
Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 1st day of February 2021.
RICHARDSON ADAMS, PLLC
/s/ Gregory M. Adams
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