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. 27th Street Boise, Idaho 83702 Telephone: (208) 938-2236

Fax: (208) 938-7904

greg@richardsonadams.com peter@richardsonadams.com 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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Of Attorneys for Calpine Energy Solutions, LLC