BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2193

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Application for Approval of 2022 All-Source Request for Proposal NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Northwest & Intermountain Power Producers Coalition ("NIPPC") petitions the Oregon Public Utility Commission (the "Commission") to intervene and appear with full party status. In support of this petition to intervene, NIPPC provides the following information:

The name and address of NIPPC is:

Northwest & Intermountain Power Producers Coalition Spencer Gray Executive Director P.O. Box 504 Mercer Island, WA 98040 Email: sgray@nippc.org

Sanger Law, PC will represent NIPPC in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.¹ The 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.

NIPPC's members include independent power producers which may bid into PacifiCorp's 2022 all source request for proposals. NIPPC is committed to fair and open-access transmission service, cost effective power sales, consumer choice in their energy supply, and fair, competitive power markets in the northwest and adjacent markets.

NIPPC's members include: Calpine, Constellation Energy, Constellation Exelon, DG Energy Partners / Sun2o, Ecoplexus, EDF Renewable Energy, EDP Renewables, Invenergy LLC, Morgan Stanley, NRG Energy, NewSun Energy, NextEra Energy, Obsidian Renewables, Perennial Power Holdings, Shell Energy North America, Sierra Pacific Industries, TransAlta Energy Marketing, and Tyr Energy.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, utility resource procurement, requests for proposals, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding utility requests for proposals and competitive bidding, including the establishment of the current competitive bidding rules and PacifiCorp's recent requests for proposals. NIPPC's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, NIPPC's interest is not adequately represented by any other party in this proceeding.

WHEREFORE, NIPPC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and 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 10th day of September 2021.

Respectfully submitted,

Irion Sanger Joni Sliger

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Of Attorneys for the Northwest & Intermountain Power Producers Coalition