

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

In the Matter of)	UM 2317
)	
IDAHO POWER COMPANY)	NORTHWEST & INTERMOUNTAIN
)	POWER PRODUCERS COALITION
Application for Approval of 2028 All-Source)	PETITION TO INTERVENE
Request for Proposals to Meet 2028 Capacity)	
Resource Need.)	
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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 in this proceeding, and NIPPC provides the following information:

1. 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

2. Richardson Adams, PLLC and 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:

Spencer Gray
Executive Director
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Mercer Island, WA 98040
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3. 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.

4. NIPPC has a substantial interest in this proceeding where Idaho Power Company (“Idaho Power”) seeks approval of its request for proposals under the Commission’s competitive bidding rules for its acquisition of major generation resources. NIPPC was the petitioner that requested that the Commission adopt competitive bidding guidelines in UM 1182 and was an active participant in the Commission’s administrative rulemaking in AR 600 that adopted the current competitive bidding rules. Consistent with its mission, NIPPC regularly participates in Commission proceedings regarding the competitive bidding rules to ensure major resource acquisitions are as competitive and robust as reasonably possible. Independent power producers, including NIPPC members, may participate in Idaho Power’s competitive solicitations at issue in this docket, as well as future solicitations, and NIPPC’s participation in this proceeding can help ensure that such processes are reasonable, fair, and balanced. Thus, NIPPC has a direct interest

¹ NIPPC’s members include but are not limited to: Apex Clean Energy, Avangrid Renewables, Aypa, Brookfield Renewable, Calpine Corp., Capital Power, Clearway, Copenhagen Infrastructure Partners, Constellation, Cypress Creek Renewables, DG Energy Partners, EDF Renewable Energy, EDP Renewables, Enel Green Power, esVolta, Invenergy LLC, Morgan Stanley, NextEra Energy, Obsidian Renewables, Pattern, Perennial Power Holdings, Pine Gate Renewables, Qcells, Shell Energy North America, and TransAlta.

in this docket. NIPPC's interests are not adequately represented by any other party in this proceeding.

5. NIPPC has participated in numerous regulatory proceedings related to request for proposals, bidding guidelines, and competitive markets. NIPPC's legal counsel have participated in numerous Commission proceedings and investigations regarding Oregon's investor-owned utilities, including Idaho Power. 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.

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.

RESPECTFULLY SUBMITTED this 6th day of March 2024.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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Of Attorneys for the Northwest &
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