

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2108

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	NORTHWEST AND
)	INTERMOUNTAIN POWER
Application for an Order Approving Queue)	PRODUCERS COALITION
Reform Proposal.)	PETITION TO INTERVENE
_____)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Northwest and 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 and 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 2020 all source request for proposal. 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 has a substantial interest in this proceeding because the Commission's Order regarding whether to approve PacifiCorp's Queue Reform Proposal will have an effect on its members that plan to, or already, engage in PacifiCorp's interconnection and power purchase agreement ("PPA") contracting processes. The Commission's decision has the potential to burden NIPPC's members with increased interconnection study fees

¹ NIPPC's members include: Calpine, Constellation Energy, Cycle, EASE LLC, Ecoplexus, EDF Renewable Energy, EDP Renewables, Geronimo Energy, Invenergy LLC, Morgan Stanley, NewSun Energy, Obsidian Renewables, Perennial Power Holdings, Shell Energy North America, Sierra Pacific Industries, TLS Capital, TransAlta Energy Marketing, and Tyr Energy.

and deposits, as well as increased wait-times to engage in the PPA execution process. NIPPC has additional interests in PacifiCorp's cost-sharing proposals, its proposed treatment of qualifying facilities ("QFs") 10 MW or greater, and the effect this proposal will have on existing QFs, which PacifiCorp has yet to explain with specificity. As these issues and potentially several other unresolved issues discourage qualifying facility growth, NIPPC petitions to intervene to gain a full understanding of how this Queue Reform Proposal will ultimately affect its members.

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 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 4th day of August 2020.

Respectfully submitted,



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