

**BEFORE THE
OREGON PUBLIC UTILITY COMMISSION**

LC 48

In the Matter of)
)
PORTLAND GENERAL ELECTRIC CO.)
)
2009 Integrated Resource Plan.)
_____)

**NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION
PETITION TO INTERVENE**

Pursuant to the Commission’s Rules, OAR 860-012-0001, the Northwest & Intermountain Power Producers Coalition (“NIPPC”) petitions to intervene in this proceeding. In support of its Petition, NIPPC states as follows:

1. The name and address of the Petitioner are as follows:

Robert D. Kahn, Executive Director
NIPPC
1117 Minor Avenue, Suite 300
Seattle, WA 98101
Telephone: 206.236.7200
Email: rkahn@nippc.org

2. The name and address of Petitioner’s attorney is as follows:

Susan K. Ackerman, Attorney
621 SW Morrison, Suite 700
Portland, Oregon 97205
Telephone: 503.297.2392
Email: susan@ska-law.com

3. NIPPC is a trade association whose members and associate members include independent power producers¹ active in the Pacific Northwest and Western energy markets. The

¹ Members include Calpine, Capital Power Operations (USA), Inc., Constellation Energy Control and Dispatch, ENMAX Corporation, EverPower Renewables, First Wind, Horizon Wind Energy, Invenergy LLC, LS Power

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, and monitoring competitive solicitations for compliance with existing rules and policies.

4. NIPPC has a substantial interest in this docket. NIPPC's members desire to advance competitive resource procurement policies in Oregon in the belief that such policies provide cost savings and other benefits for Oregon's economy and its electricity consumers. PGE's Integrated Resource Plan shows the need for new generating resources, indicates that the company has benchmark resource in mind to meet that need, and indicates that the company will conduct competitive solicitations for those resources. NIPPC has previously and actively participated in Docket Nos. UM 1066, UM 1182, LC 33, UM 1208, UM 1276, UM 1374, UM 1368, and UM 1429. NIPPC's interest in this docket will not be represented by any other party.

5. NIPPC requests that the names of Robert D. Kahn and Susan K. Ackerman be placed on the official service list in this docket.

6. NIPPC waives paper service of documents.

7. For all the reasons stated herein, NIPPC asks that its Petition to Intervene be granted.

DATED this 11th day of November, 2009.

Attorney for NIPPC:

/s/ Susan K. Ackerman
Susan K. Ackerman, OSB # 83138
621 SW Morrison, Suite 700
Portland, OR 97205
Tel: 503.297.2392
Email: susan@ska-law.com

Associates, Ridgeline Energy, Shell Energy North America, TransAlta Energy Marketing, Inc., TransCanada, Sea Breeze Power Corp., National Energy Systems Co.

CERTIFICATE OF SERVICE

I certify that I have this day served copies of the foregoing NIPPC Petition to Intervene to all parties or attorneys of parties, listed on the service list compiled by the OPUC in this docket.

DATED this 11th of November, 2009.

/s/ Susan K. Ackerman

Susan K. Ackerman

LC 48 Service List

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