

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 66

In the Matter of) INVENERGY, LLC’s PETITION TO
) INTERVENE
PORTLAND GENERAL ELECTRIC)
COMPANY,)
)
2016 Integrated Resource Plan)
)

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Invenergy, LLC (“Invenergy”) petitions the Oregon Public Utility Commission (the “Commission”) to intervene and appear with full party status. In support of this petition to intervene, Invenergy provides the following information:

The name and address of Invenergy is:

Invenergy, LLC
Orijit Ghoshal
Manager Regulatory Affairs
2580 W. Main Street, Suite 200
Littleton, CO 80120
Telephone: (303) 800-9340
Email: OGhoshal@invenergyllc.com

Tomasi Salyer Martin and Jeep & Blazer, LLC will represent Invenergy in this proceeding. An application for admission of Jeffery D. Jeep *pro hac vice* is pending with the Oregon State Bar. Once approved by the Oregon State Bar, Attorney Jeep will file a motion with the Commission for admission to appear in this matter *pro hac vice*. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

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Invenergy is the largest independent, privately held renewable energy provider in North America. Invenergy's assets produce power for the Columbia Grid, which provides power to the PGE service area. As such, Invenergy has an interest in the rules and policies relating to supplying electric power in the Pacific Northwest, and the PGE service area in particular.

Invenergy has a substantial interest in this proceeding because any Commission decision regarding PGE's 2016 integrated resource plan ("IRP") could have a significant impact on the markets for which Invenergy produces power in the Pacific Northwest and because Invenergy may participate in any subsequent requests for proposals.

Invenergy has participated, either by itself or through trade organizations, in numerous regulatory proceedings intended to promote competitive power markets in the Pacific Northwest. Invenergy's interests are not adequately represented by any other party in this proceeding.

WHEREFORE, Invenergy 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

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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: December 16, 2016.

Respectfully submitted,

s/ John W. Weil

By: _____
John W. Weil, OSB No. 803967
Of Attorneys for Invenergy, LLC

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