

Morgan Lewis

Marilyn Elkins

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October 22, 2019

VIA E-MAIL

Public Utility Commission of Oregon
Attn: PUC Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088
PUC.FilingCenter@state.or.us

Re: LC 70 – PacifiCorp's 2019 IRP

Dear Filing Center:

Please find attached for filing (in PDF-A format) PacifiCorp's 2019 Petition to Intervene in this proceeding.

Please contact me if you have any questions at 415-442-1651.

Sincerely,

/s/ Marilyn Elkins

Marilyn Elkins

Attachment

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 70

LC-70 -- ParcifiCorp's 2019 Integrated
Resource Plan

Swan Lake North Hydro LLC
PETITION TO INTERVENE

Swan Lake North Hydro LLC ("Swan Lake") petitions to intervene in this proceeding, and in support of this Petition, states as follows:

1. The contact information (name, address, e-mail address) for Swan Lake is:

Erik Steimle
President
Swan Lake North Hydro, LLC
220 NW 8th Ave.
Portland, OR 97209
Phone: (503) 998-0230
erik@ryedevelopment.com

Nathan Sandvig
Vice President
Swan Lake North Hydro LLC
404 Wyman Street
Waltham, MA 02451
Phone: (503) 602-0998
Nathan.Sandvig@nationalgrid.com

2. The names and addresses of the persons to be included on the official service list in this docket are:

Erik Steimle
President
Swan Lake North Hydro, LLC
220 NW 8th Ave.
Portland, OR 97209
Phone: (503) 998-0230
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Waltham, MA 02451
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3. Swan Lake is a joint venture company owned by an affiliate of Rye Development and an affiliate of National Grid USA. Swan Lake is actively engaged in the development of a pumped storage hydroelectric project in the service territory of Portland General Electric. These kinds of projects can help enable the transition of the United States' electric system to a low-carbon grid and support other renewable energy technologies as an integration tool at the necessary scale to stabilize the variable output from renewable energy resources.

4. Swan Lake is developing the Swan Lake Energy Storage Project. The Swan Lake Energy Storage Project is a 400 MW closed-loop energy storage project in Klamath County, Oregon. The project will be a critical component of the Pacific Northwest's decarbonized electric grid while also producing thousands of well-paying jobs and substantial economic benefits to Southern Oregon. Closed Loop Pumped Storage represents a safe, reliable, and environmentally sound way to support the successful integration of large amounts of new wind and solar power projects in the Pacific Northwest.

5. Swan Lake has an interest in resource planning and ensuring that PacifiCorp's integrated resource planning process appropriately analyzes and considers opportunities for investment in generation, transmission, and energy storage. Any Commission decision regarding PGE's 2019 IRP could have a significant impact on power markets in Oregon, including the viability of any future pumped hydro projects.

6. Swan Lake intends to actively participate as a party in this proceeding to raise any pertinent issues.

7. Based on the information provided above, and in accordance with the Commission's rules of procedure, Swan Lake hereby requests to participate in this proceeding as an intervenor. Swan Lake will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See OAR 860-001-0300.*

8. Swan Lake therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 22nd day of October, 2019.

Respectfully submitted,

A handwritten signature in blue ink that reads "Nathan Sandvig". The signature is written in a cursive style and is positioned above a horizontal line.

Nathan Sandvig
Director, Business Development
National Grid USA