

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**LC 70**

In the Matter of

PACIFICORP, dba PACIFIC POWER

2019 Integrated Resource Plan

NORTHWEST AND  
INTERMOUNTAIN POWER  
PRODUCERS COALITION'S  
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  
Carol Opatrny  
Interim Executive Director  
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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. 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.

PacifiCorp's 2019 integrated resource plan ("IRP") could have a direct and substantial impact on NIPPC's members. The IRP represents PacifiCorp's commitment to develop a long-term resource plan that considers cost, risk, uncertainty, and the long-run public interest. The IRP will form the foundation for PacifiCorp's future generation, demand side management, and transmission investments.

The IRP will impact PacifiCorp's future resource acquisition plans. PacifiCorp is proposing to acquire: 1) more than 3,000 MW of new solar resources by year end 2023, increasing to more than 6,300 MW by year end 2038; 2) more than 3,500 MW of new wind resources by year end 2023, increasing to more than 4,600 MW by year end 2038;

3) nearly 600 MW of battery storage by year end 2023, increasing to more than 2,800 MW of battery storage by year end 2038; and 4) a new 400-mile transmission line by year end 2023 as well as several near-term transmission upgrades. The IRP inputs, assumptions and action plans will impact whether these resources will be competitively procured.

The IRP will also impact whether the competitive bidding rules recently adopted by the Commission are effectively applied to ensure competitive procurement actually occurs. The IRP states that PacifiCorp plans to issue RFPs as part of its preferred portfolio, and the competitive bidding rules require a utility to include detailed information regarding an upcoming RFP in the IRP. The IRP will impact the competitive wholesale and retail markets not only through these specific RFPs but also in setting the bar for the long-term implementation of the new competitive bidding rules.

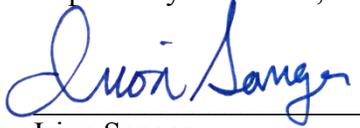
Without participation, NIPPC would not have the ability to impact the proceeding, which could result in material harm to the competitive wholesale and retail markets and to NIPPC's members' ability to sell power to end use consumers and Oregon's electric utilities.

NIPPC has participated in numerous regulatory proceedings related to RFPs, bidding guidelines, and competitive markets. NIPPC's legal counsel have participated in numerous Commission proceedings and investigations regarding Oregon's investor owned utilities, including PacifiCorp. 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.

Dated this 10th day of January 2020.

Respectfully submitted,



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