

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

2019 Integrated Resource Plan

PETITION TO INTERVENE OF
NEWSUN ENERGY LLC

NewSun Energy (NewSun) respectfully petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-001-0300 and ORS 756.525. In support of this Petition, NewSun provides the following:

The name and address of the Company is:

NewSun Energy LLC
2033 E. Speedway Blvd, Suite 200
Tucson, AZ 85719

The petitioner will be represented by counsel in this proceeding. The names and addresses of the persons to be included on the official service list in this proceeding are:

Jacob H. Stephens
CEO and Founder
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NewSun is a Delaware limited liability company that successfully brought solar projects to commercial operation in Oregon and under Portland General Electric Company's (PGE's) standard power purchase agreement for qualifying facilities (QFs) and owns current and prospective solar and storage projects that may execute standard power purchase agreements with PGE in the future. NewSun is seeking intervention on its own behalf and not as a member of a trade group or other organization.

NewSun has special knowledge or expertise that may assist the Commission in resolving the issues in this proceeding. NewSun has experience with PGE's standard PURPA avoided cost prices and any changes made in this docket are likely to impact avoided cost prices and projects in Oregon. These outcomes could have a direct impact on NewSun's business. NewSun has participated in other regulatory dockets before the Commission including regarding PURPA implementation, avoided costs and interconnection. NewSun anticipates participating to the extent necessary to ensure its interests are protected. NewSun's interests are not adequately represented by any other party, and its participation will assist the Commission in resolving issues.

Based on the information provided above in compliance with the Commission's rules of procedures, NewSun requests approval to participate in these proceedings as an intervenor. NewSun's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

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NewSun Energy LLC therefore respectfully requests that the Commission grant this
Petition to Intervene.

Dated this 3rd day of March, 2021.

Respectfully submitted,

/s/ Marie P. Barlow

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