

**BEFORE THE PUBLIC UTILITY**

**COMMISSION OF OREGON**

**LC 73**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

2019 Integrated Resource Plan.

GOLDENDALE ENERGY  
STORAGE PETITION TO  
INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Goldendale Energy Storage (“Goldendale”) petitions the Public Utility Commission of Oregon (the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7). In support of this Petition, Goldendale provides the following information:

The name and address of Goldendale is:

Goldendale Energy Storage  
Attn: Michael Rooney  
Vice President, Project Management  
830 NE Holladay St,  
Portland, OR 97232  
Phone: (412) 400-4186  
[michael@ryedevelopment.com](mailto:michael@ryedevelopment.com)

Van Ness Feldman will represent Goldendale in this proceeding. Please update the official service list with the following individuals:

Michael Rooney  
Vice President, Project Management  
Rye Development  
830 NE Holladay St,  
Portland, OR 97232  
Phone: (412) 400-4186  
[michael@ryedevelopment.com](mailto:michael@ryedevelopment.com)

Nathan Sandvig  
Vice President  
Rye Development  
830 NE Holladay St,  
Portland, OR 97232  
Phone: (503) 602-0998  
[nathan@ryedevelopment.com](mailto:nathan@ryedevelopment.com)

Chris Zentz  
Van Ness Feldman, LLP  
1191 Second Avenue, Suite 1800  
Seattle, WA 98101  
[cdz@vnf.com](mailto:cdz@vnf.com)

Goldendale is actively engaged in the development of a pumped storage hydroelectric project near Goldendale, WA. Pumped storage 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.

Goldendale has an interest in resource planning and ensuring that Portland General Electric'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 Update could have a significant impact on power markets in Oregon, including the viability of any future pumped hydro projects.

Goldendale has participated alongside Swan Lake North Hydro, LLC in other regulatory proceedings, including PGE's 2016 IRP and this proceeding; however, to date, Goldendale has not officially sought party status.

Goldendale's participation will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.

Based on the information provided above, and in accordance with the Commission's rules of procedure, Goldendale hereby requests to participate in this proceeding as an intervenor. Goldendale therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 5<sup>th</sup> day of March, 2021.

Respectfully Submitted,

/s/ Chris Zentz

Chris Zentz

Attorney for Goldendale Energy Storage