

Sidney Villanueva
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October 9, 2019

Via email

Filing Center
Public Utility Commission of Oregon
201 High Street SE
Salem, OR 97308

**Re: Portland General Electric Company 2019 IRP
Docket No. LC 73**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Petition to Intervene of Swan Lake North Hydro, LLC.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Sidney Villanueva
Sidney Villanueva
TROUTMAN SANDERS LLP

Attorney for Swan Lake North Hydro, LLC

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2019 Integrated Resource Plan.

SWAN LAKE NORTH HYDRO, LLC
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Swan Lake North Hydro, LLC (“Swan Lake”) 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, Swan Lake provides the following information:

The name and address of Swan Lake is:

Swan Lake North Hydro, LLC
Attn: Erik Steimle
220 NW 8th Ave
Portland, OR 97209
erik@ryedevelopment.com

Troutman Sanders will represent Swan Lake in this proceeding. Please update the official service list with the following individuals:

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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.

Swan Lake 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 could have a significant impact on power markets in Oregon, including the viability of any future pumped hydro projects.

Swan Lake has participated in other regulatory proceedings, including PGE's 2016 IRP, and intends to actively participate as a party in this proceeding to raise any pertinent issues. Swan Lake'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, Swan Lake hereby requests to participate in this proceeding as an intervenor. Swan Lake therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 9th day of October, 2019.

Respectfully submitted

/s/ Sidney Villanueva

Sidney Villanueva

TROUTMAN SANDERS LLP

Attorney for Swan Lake North Hydro, LLC