

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**LC 73**

In the Matter of	)	
	)	NORTHWEST AND
PORLAND GENERAL ELECTRIC	)	INTERMOUNTAIN POWER
COMPANY	)	PRODUCERS COALITION
	)	PETITION TO INTERVENE
2019 Integrated Resource Plan	)	
	)	

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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  
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Sanger Thompson PC and Blue Planet Energy Law 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.<sup>1</sup> 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.

PGE's 2019 integrated resource plan ("IRP") could have a direct and substantial impact on NIPPC's members. The IRP represents PGE's commitment to develop a long-term resource plan that considers cost, risk, uncertainty, and the long-run public interest.

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<sup>1</sup> NIPPC's members include: Calpine Corp, Constellation Exelon, Cypress Creek Renewables, Direct Energy, Ecoplexus, EDF Renewable Energy, EDP Renewables, Geronimo Energy, Invenergy LLC, Morgan Stanley, NewSun Energy, National Grid, Obsidian Renewables, Perennial Power Holdings, Shell Energy North America, Sierra Pacific Industries, TLS Capital, and TransAlta Energy Marketing.

The IRP will form the foundation for PGE's future generation, demand side management, and transmission investments.

The IRP will impact PGE's future resource acquisition plans. PGE is proposing to acquire: 1) 150 MWa of renewables in 2023, increasing to 227 MWa by 2025 (579 MWa of new wind by year end 2022); 2) up to 159 MWa of RPS-eligible resources to enter portfolio end year end 2023; 3) 685 MW of capacity resources by 2025 consisting of bilateral agreements as current contracts expire; 4) 37 MW of 6-hour batteries by 2024; 5) 200 MW of pumped storage by 2024; and 6) transmission, which will be in the final IRP document. The IRP inputs, assumptions and action plans will impact whether these resources will be competitively procured.

The IRP will impact PGE's direct access program, and the ability of electricity service suppliers to directly sell power to end use consumers. PGE argues that the direct-load customers who have opted out for service by another provider still present a challenge to PGE because if their preferred provider has inadequate resources, and PGE claims that it could become responsible for these loads.

The IRP will impact PGE's retail rates as well as its avoided cost rates for QFs that sell power under the Public Utility Regulatory Policies Act ("PURPA"). Some of NIPPC's members are QFs that have (or intend to have) power purchase agreements ("PPAs") with Oregon utilities with rates based on its avoided costs.

If passed, the IRP will impact PGE's compliance with Oregon's new cap and invest program for greenhouse gas emissions. PGE's resource procurement, avoided cost

rates, and direct access programs will all need to account for this new legislative mandate.

Without participation, NIPPC would not have the ability to participate in the proceeding, which could result in material harm to the competitive wholesale and retail markets, and 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 PGE. 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 24th day of May 2019.

Respectfully submitted,

A handwritten signature in blue ink that reads "Irion Sanger".

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