

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 335**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	NORTHWEST AND
COMPANY	)	INTERMOUNTAIN POWER
	)	PRODUCERS COALITION PETITION
Request for a General Rate Revision	)	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  
Robert D. Kahn  
Executive Director  
P.O. Box 504  
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Telephone: (206) 236-7200  
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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.<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.

NIPPC has a substantial interest in this proceeding because Portland General Electric's ("PGE") general rate case filing could have a significant impact on Oregon's regulatory policies regarding PGE's retail direct access program, including NIPPC's members' ability to participate in competitive energy markets and sell power to Oregon customers. PGE has proposed major changes in its five year opt out direct access

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

program, and to have the ability to de-certify electricity service suppliers. NIPPC's interests are not be adequately represented by any other party in this proceeding.

NIPPC has participated in numerous regulatory proceedings related to direct access, requests for proposals, competitive bidding guidelines, and competitive markets. NIPPC's legal counsel has 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 2nd day of March 2018.

Respectfully submitted,



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