

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 399

In the Matter of

PACIFICORP, dba PACIFIC POWER

Request for a General Rate Revision

PETITION TO INTERVENE OF
NEWSUN ENERGY LLC

NewSun Energy, LLC (“NewSun”) respectfully petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding pursuant to OAR 860-001-0300 and ORS 756.525. In support of this Petition, NewSun provides the following:

1. The name and address of Intervenor is:

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

2. NewSun 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:

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3. NewSun is a Delaware limited liability company that has successfully brought solar projects to commercial operation in Oregon and currently owns solar and storage projects in operation and under development. NewSun is seeking intervention on its own behalf and not as a member of a trade group or other organization.

4. On March 1, 2022 PacifiCorp dba Pacific Power (“PacifiCorp”) filed a Request for a General Rate Revision. PacifiCorp’s proposed rate change will directly and significantly affect NewSun as a solar generation and storage project developer. The proposed rate change will implicate a wide variety of policy interests, including renewable energy policy and rate recovery. NewSun’s interest extends to protecting policy positions in response to this rate case, and arguments raised by PacifiCorp and other parties. In addition, the outcome of this proceeding will affect the rates charged to customers eligible for direct access in Oregon, and to businesses exploring the option of siting new loads in the State of Oregon. Therefore, that outcome will affect the market for retail electricity services currently under exploration by NewSun.

5. NewSun intends to participate as a party in Docket UE 399, including monitoring the proceeding and, if necessary, raising issues appropriate to the proceeding, introducing evidence, filing testimony, calling and examining or cross-examining witnesses, participating in settlement discussions, and being heard in argument.

6. NewSun has special knowledge or expertise that may assist the Commission in resolving the issues in this proceeding. NewSun has experience with renewable and clean energy standards, energy and capacity values, interconnection, transmission, and resource planning. NewSun has participated in other regulatory dockets before the Commission including regarding integrated resource planning, requests for proposals, Public Utility Regulatory Policy Act implementation, avoided costs, interconnection, capacity valuation and resource adequacy.

NewSun is still considering the issues and may address any other issues relevant to its interest in renewable energy policy and rate recover raised by PacifiCorp or other parties. 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.

7. Without the opportunity to intervene, NewSun would not be able to participate in this proceeding, which may have material impacts on its business activities in the State of Oregon.

8. 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.

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

Dated this 28th day of April, 2022.

Respectfully submitted,

/s/ Max M. Yoklic
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