

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON**

**UM 1345**

In the Matter of )  
 )  
Portland General Electric Company's Request For )  
Proposals for Energy Resources )  
\_\_\_\_\_ )

**NORTHWEST & INTERMOUNTAIN  
POWER PRODUCERS COALITION  
PETITION TO INTERVENE AS A PARTY**

Pursuant to the Commission's Rules, OAR 860-013-0021, the Northwest & Intermountain Power Producers Coalition ("NIPPC") petitions to intervene as a party. In support of this Petition, NIPPC states as follows:

1. The name and address of the Petitioners are as follows:

Robert D. Kahn, Executive Director  
NIPPC  
7900 SE 28<sup>th</sup> Street, Suite 200  
Mercer Island, WA 98040-2970  
Telephone: 206.236.7200  
Email: rkahn@nippc.org

2. The name and address of Petitioner's attorney is as follows:

Susan K. Ackerman, Attorney  
9883 NW Nottage Dr.  
Portland, Oregon 97229  
Telephone: 503.297.2392  
Email: susan.k.ackerman@comcast.net

3. NIPPC is a trade association whose members and associate members include independent power producers<sup>1</sup> active in the Pacific Northwest and Western energy markets. 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.

4. NIPPC has a substantial interest in this docket as its members may desire to participate in Portland General Electric's Request for Proposals (RFP). Also, NIPPC previously actively participated in related dockets, Docket Nos. UM 1182 and UM 1208. NIPPC's interest in this docket is thus substantial and will not be represented by any other party.

5. NIPPC waives paper service of documents in this docket.

6. NIPPC requests that the names of Robert Kahn, Susan Ackerman, and Scott Gutting be placed on the official service list in this docket. Mr. Gutting's address is as follows:

Scott Gutting  
Energy Strategies  
215 South State Street, Suite 200  
Salt Lake City, Utah 84111  
Telephone: (801) 355-4365  
Email: sgutting@energystrat.com

7. For all the reasons stated herein, NIPPC asks that its request to intervene as a party in this docket be granted.

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<sup>1</sup> Members include BP Alternative Energy NA, Calpine, Constellation Control Energy and Dispatch, ENMAX, enXco, EPCOR, Grays Harbor Energy Center LLC, Horizon Wind Energy, Mint Farm Energy LLC, National Energy Systems Co., Sierra Pacific Industries, Suez Energy North America, TransAlta, Transcanada, Sea Breeze Power Corp., Wallula Resource Recovery.

DATED this 25<sup>th</sup> day of September, 2007.

Attorney for NIPPC:

/s/ Susan K. Ackerman

Susan K. Ackerman, OSB # 83138

9883 NW Nottage Dr.

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September 25, 2007

VIA Electronic Mail & U.S. Mail

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148

Re: UM 1345

Enclosed is NIPPC's Petition to Intervene in the above referenced docket. Hard copies will follow in the U.S. Mail.

Please call me if you have any questions.

Very truly yours,

**/s/ Susan K. Ackerman**

Susan K. Ackerman  
Attorney for NIPPC

Enclosures

## Certificate of Service

I certify that I have this day served NIPPC's Petition to Intervene upon all parties of record in UM 1345 by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to all parties or attorneys of parties, on the service list compiled by the OPUC.

Dated this 25<sup>th</sup> day of September, 2007.

/s/ Susan K. Ackerman  
Susan K. Ackerman  
Attorney for NIPPC  
9883 NW Nottage Dr.  
Portland, Oregon 97229

**W**

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