



4. NIPPC is a trade association whose members include independent power producers (including developers of Qualifying Facilities under the Public Utility Regulatory Policies Act (PURPA)) and electricity service providers 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, including rules affecting sale of power under PURPA, fair, accurate and transparent pricing for electric power and transmission in the region and opportunities for fair and open retail competition in the electricity market. In the recent past, NIPPC has been active before the Commission on matters affecting retail direct access, including implementation of the direct access programs by PacifiCorp.

5. Included in the UM 1734 petitions by PacifiCorp is a request to change the tariff for Power Purchase Agreements with Qualifying Facilities as follows, including reducing the eligibility cap applicable to standard contracts from 10 megawatts (MW) to 100 kilowatts (kW) for wind and solar QFs; and reducing the fixed price contract term from 15 years to three years for all QF projects. As such, NIPPC and its members have a direct and substantial interest in this proceeding.

6. NIPPC intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which NIPPC will introduce is dependent upon the nature and effect of other evidence in this proceeding.

8. Without the opportunity to intervene herein, NIPPC and its members would be without any means of participation in this proceeding which may have a material impact

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<sup>1</sup> NIPPC's members include Calpine Corporation, Capital Power Corporation, Constellation Energy Control & Dispatch, EDF Renewable Energy, Gridforce Energy Management, Invenergy LLC, Morgan Stanley, Noble Solutions, Perennial Power Holdings, Inc. Shell Energy North America, Sierra Pacific Industries, and TransAlta Energy Marketing, Inc.

on its members' business activities in the State of Oregon.

9. Granting NIPPC's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

10 For all reason stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor with all rights incumbent to that status. Granting NIPPC's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 29th day of May, 2015.

*s/ Carl  
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