

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

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In the Matter of:	)	<b>UM 1751</b>
	)	
Public Utility Commission of Oregon	)	PETITION TO INTERVENE OF
	)	NORTHWEST AND INTERMOUNTAIN
<i>Implementing an Energy Storage Program</i>	)	POWER PRODUCERS COALITION

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The Northwest & Intermountain Power Producers Coalition ("**NIPPC**") hereby petitions the Public Utility Commission of Oregon ("Commission"), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of the Intervenor is as follows:

Northwest and Intermountain Power Producers Coalition  
c/o Robert D. Kahn, Executive Director  
PO Box 504, Mercer  
Island WA 98040  
rkahn@nippc.org

2. Intervenor, NIPPC, will be represented herein by:

Carl Fink (OSB No. 980262)  
Blue Planet Energy Law, LLC  
Suite 200  
628 SW Chestnut Street  
Portland, Oregon 97219  
Telephone: 971.266.8940  
CMFink@Blueplanetlaw.com

3. NIPPC requests that the names of Robert Kahn and Carl Fink be placed on the official service list for this docket.

4. NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets.<sup>1</sup> NIPPC members also offer energy storage products throughout North America. 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 the procurement and sale of energy storage systems.

5. This docket was opened by the Commission to comply with HB 2193 (2015),<sup>2</sup> which requires the PUC to develop energy storage guidelines by January 1, 2017, consider utility energy storage project proposals submitted by January 1, 2018, and implement an energy storage procurement program by January 1, 2020.

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.

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

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

9. For all the reasons stated herein, in compliance with the Commission's rules of procedure, NIPPC requests to participate in this proceeding as an Intervenor with all rights

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<sup>1</sup> A current list of NIPPC members can be found at <http://www.nippc.org/info/members.tpl>.

<sup>2</sup> Available at <https://olis.leg.state.or.us/liz/2015R1/Downloads/MeasureDocument/HB2193>

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 21st day of December, 2015.

*s/Carl Fink*

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