

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1930**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Community Solar Program Implementation

NORTHWEST AND  
INTERMOUNTAIN POWER  
PRODUCERS COALITION  
PETITION 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  
Carol Opatrny  
Interim Executive Director  
18509 NE Cedar Drive  
Battle Ground, WA. 98604  
Tel: 360-666-8510  
Email: ccopat@e-z.net

Sanger Thompson, 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.

The Commission's Implementation of the Community Solar Program will directly impact the interests of NIPPC's members given that a Community Solar Program Project may be owned by an independent power producer. Relatedly, Staff has the position that a Community Solar Program Project must be a QF under PURPA,<sup>2</sup> and has proposed

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

<sup>2</sup> Staff Draft Proposal for Community Solar interconnection at Attachment A Department of Justice Interoffice Memo re CSP Projects as QFs (June 19, 2019).

changes to Oregon's small generator interconnection rules used for interconnecting community solar projects.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, PURPA, renewable energy, interconnection, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility. 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. Finally, NIPPC's interest is not adequately represented by any other party in 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 28th day of October 2019.

Respectfully submitted,



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Of Attorneys for the Northwest and Intermountain  
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