

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2011

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

General Capacity Investigation

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
Robert D. Kahn
Executive Director
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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.¹ NIPPC's mission 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.

NIPPC has participated in numerous regulatory proceedings intended to promote competitive markets, the Public Utility Regulatory Policies Act, renewable energy, and diversity of generation ownership, including all the recent major proceedings regarding qualifying facility contract and rate eligibility and all of the recent major utility requests

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

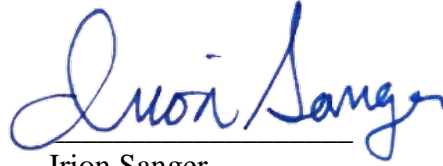
for proposals (“RFPs”). Docket No. UM 2011 will investigate the meaning of the term “capacity,” how capacity is acquired, and how capacity should be valued.² Regardless of how each of these questions is answered, the decisions in this docket will have implications for NIPPC’s members to the extent the decisions impact the price utilities pay to qualifying facilities and the timing, process, and pricing for utility RFPs. NIPPC intends to advocate for sound decision-making on these topics that reflect market realities and that do not unduly favor utilities. 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 brings expertise and a unique perspective from IPPs of all sizes and technology types, which 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.

² *In re Pub. Util. Comm’n of Oregon General Capacity Investigation*, Docket No. UM 2011, Order No. 19-155, Appendix A at 2.

Dated this 16th day of July 2019.

Respectfully submitted,



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