

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2011

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Generic Capacity Intervention

SWAN LAKE NORTH HYDRO, LLC
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Swan Lake North Hydro, LLC (“Swan Lake”) petitions the Public Utility Commission of Oregon (the “Commission”) to intervene in this proceeding. In support of this petition, Swan Lake provides the following information:

The name and address of Swan Lake intervenors are:

Erik Steimle
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The name and address of the attorney representing Swan Lake is:

Sidney Villanueva
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Swan Lake is a joint venture company owned by an affiliate of Rye Development and an affiliate of National Grid USA. Swan Lake is actively engaged in the development of a pumped storage hydroelectric project in Oregon. This kind of utility-scale project offers a unique capacity product that can help enable the transition of the United States' electric system to a low-carbon grid and support other renewable energy technologies as an integration tool at the necessary scale to stabilize the variable output from renewable energy resources.

Swan Lake has an interest in this investigation because any Commission decision harmonizing or clarifying how capacity is defined, acquired and valued in Oregon could have a significant impact the viability of any future pumped hydro projects in the region. Swan Lake has a unique perspective that is not adequately represented by any other party in this proceeding.

Swan Lake has participated in other regulatory proceedings at the Commission, including LC 66 and LC 73, and intends to actively participate in this proceeding. Swan Lake's participation will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay the proceeding.

Based on the information provided above, and in accordance with the Commission's rules of procedure, Swan Lake hereby requests to participate in this proceeding as an intervenor. Swan Lake therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 9th day of January, 2020.

Respectfully submitted

/s/ Sidney Villanueva
Sidney Villanueva
TROUTMAN SANDERS LLP

Attorney for Swan Lake North Hydro, LLC