

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 2059

In the Matter of

PACIFICCORP d/b/a PACIFIC POWER's

Application for Approval of 2020 All-
Source Request for Proposals.

Swan Lake North Hydro LLC's
PETITION TO INTERVENE

Swan Lake North Hydro LLC ("Swan Lake") petitions to intervene in
this proceeding, and in support of this Petition, states as follows:

1. The contact information (name, address, e-mail address) for Swan Lake is:

Erik Steimle
President
Swan Lake North Hydro, LLC
220 NW 8th Ave.
Portland, OR 97209
Phone: (503) 998-0230
erik@ryedevelopment.com

Nathan Sandvig
Vice President
Swan Lake North Hydro LLC
404 Wyman Street
Waltham, MA 02451
Phone: (503) 602-0998
Nathan.Sandvig@nationalgrid.com

2. The names and addresses of the persons to be included on the official service list
in this docket are:

Erik Steimle
President
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220 NW 8th Ave.
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3. 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 the service territory of PacificCorp. These kinds of projects 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.

4. Swan Lake is developing the Swan Lake Energy Storage Project. The Swan Lake Energy Storage Project is a 400 MW closed-loop energy storage project in Klamath County, Oregon. The project will be a critical component of the Pacific Northwest's decarbonized electric grid while also producing thousands of well-paying jobs and substantial economic benefits to Southern Oregon. Closed Loop Pumped Storage represents a safe, reliable, and environmentally sound way to support the successful integration of large amounts of new wind and solar power projects in the Pacific Northwest.

5. Swan Lake has an interest in resource planning and ensuring that PacifiCorp's integrated resource planning process appropriately analyzes and considers opportunities for investment in generation, transmission, and energy storage.

PacifiCorp's 2020 All-Source Request for Proposals could have a significant impact on power markets in Oregon, including the viability of Swan Lake and other pumped hydro projects.

6. Swan Lake intends to actively participate as a party in this proceeding to raise any pertinent issues.

7. 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 will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. *See OAR 860-001-0300.*

8. Swan Lake therefore respectfully requests that the Commission grant its Petition to Intervene.

Dated this 24th day of March, 2020.

Respectfully submitted,

A handwritten signature in blue ink that reads "Nathan Sandvig". The signature is written in a cursive style and is positioned above a horizontal line.

Nathan Sandvig
Director, Business Development
National Grid USA