

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2111

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Interconnection Process
And Policies

NORTHWEST AND
INTERMOUNTAIN POWER
PRODUCERS COALITION'S
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
Spencer Gray
Executive Director
P.O. Box 504
Mercer Island, WA 98040
Email: sgray@nippc.org

Sanger Law, 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:

Spencer Gray
Executive Director
NIPPC
P.O. Box 504
Mercer Island, WA 98040
Email: sgray@nippc.org

Irion Sanger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

Joni Sliger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (425) 894-3680
Fax: (503) 334-2235
joni@sanger-law.com

NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets.¹ 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 investigation into Interconnection Process and Policies will impact many of NIPPC's Oregon members because they are interconnection customers who purchase goods and services from Oregon utilities.

NIPPC has participated in numerous regulatory proceedings intending to promote, competitive markets, PURPA, renewable energy, and diversity of generation ownership, including all the recent major proceedings where stakeholders raised issues regarding appropriate interconnection procedures. NIPPC also participated in Docket No. UM 2032, where it encouraged the Commission to consider interconnection issues in addition to the network upgrade issues that docket was created to address. The Commission did not address the interconnection issues then, instead choosing to open this separate docket

¹ NIPPC's members include: Calpine, Constellation Energy, Cycle, EASE LLC, Ecoplexus, EDF Renewable Energy, EDP Renewables, Geronimo Energy, Invenergy LLC, Morgan Stanley, NewSun Energy, Obsidian Renewables, Perennial Power Holdings, Shell Energy North America, Sierra Pacific Industries, TLS Capital, TransAlta Energy Marketing, and Tyr Energy.

to further investigate interconnection processes and policies. NIPPC petitions to intervene in this investigation so it can address the unresolved issues remaining from Docket No. UM 2032. 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 4th day of August 2020.

Respectfully submitted,



Irion Sanger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503)756-7533
Fax: (503)334-2235
irion@sanger-law.com

Of Attorneys for the Northwest & Intermountain
Power Producers Coalition