

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF OREGON**

**UM 2143**

In the Matter of PUBLIC UTILITY  
COMMISSION OF OREGON

Investigation Into Resource Adequacy  
in Oregon

PETITION TO INTERVENE OF  
BROOKFIELD RENEWABLE TRADING AND  
MARKETING LP

**BROOKFIELD RENEWABLE TRADING AND MARKETING LP**

Stephen Greenleaf  
Senior Director of Regulatory Affairs and Policy, Western U.S.  
Brookfield Renewable Trading and Marketing LP  
1568 Oglala Street  
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Dated: April 16, 2021

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Brookfield Renewable Trading and Marketing LP (“BRTM”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to Oregon Revised Statutes (“ORS”) 756.525 and Oregon Administrative Rules (“OAR”) 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as ground therefore states as follows:

1. The name and address of this Intervenor is:

Brookfield Renewable Trading and Marketing LP  
200 Liberty Street, 14<sup>th</sup> FL,  
New York, NY, 10281

2. BRTM will be represented in this docket by:

Stephen T. Greenleaf  
Senior Director, Regulatory Affairs & Policy, Western U.S.  
Brookfield Renewable Trading and Marketing LP  
Oglala Street, South Lake Tahoe, CA 96150  
T 916.802.5420  
[Steve.Greenleaf@brookfieldrenewable.com](mailto:Steve.Greenleaf@brookfieldrenewable.com)

3. Copies of all pleadings, discovery, Commission orders and other documents should be provided to the following persons:

Stephen T. Greenleaf  
Senior Director, Regulatory Affairs & Policy, Western U.S.  
Brookfield Renewable Trading and Marketing LP

Oglala Street, South Lake Tahoe, CA 96150  
T 916.802.5420  
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4. BRTM, a subsidiary of Brookfield Renewable Partners LP (“Brookfield Renewable”), provides energy marketing services and support to power generation facilities owned and operated by its Brookfield Renewable affiliates operating in the United States and Canada. BRTM is authorized by the Federal Energy Regulatory Commission to act as a power marketer engaging in wholesale electricity sales at negotiated, market-based rates throughout the United States, including the larger Western bilateral market.

5. Brookfield Renewable operates one of the world’s largest publicly traded renewable power platforms, consisting of approximately 19,000 megawatt (MW) of capacity and 5,324 generating facilities in North America, South America, Europe and Asia. Brookfield Renewable’s U.S. platform owns and operates solar, wind, storage and hydroelectric facilities across 34 states. The U.S. platform consists of over 190 utility-scale renewable facilities and 4,834 distributed energy resource projects, totaling approximately 7,300 MW in nameplate capacity.

6. Brookfield Renewable Energy Marketing US (“BREMUS”), another subsidiary of Brookfield Renewable, is a registered Electricity Service Supplier (“ESS”).<sup>1</sup> BRTM, acting as agent for BREMUS, will procure and schedule the delivery of energy and other necessary products for BREMUS for service to its direct access customers.

7. The outcome of this proceeding may affect the rates charged to customers eligible for direct access and the terms and conditions under which BREMUS, and through its agent,

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<sup>1</sup> See Docket No. ES 23 and Order 21-070.

BRTM, may offer direct access service in Oregon. BRTM therefore claims a direct and substantial interest in this proceeding.

8. Without the opportunity to intervene herein, BRTM would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

WHEREFORE, BRTM respectfully requests that this Commission grant its Petition to Intervene in this proceeding and to appear and participate in all manners as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in this proceeding.

DATED this 16<sup>th</sup> day of April, 2021.

/s/ Stephen Greenleaf

Stephen Greenleaf  
Senior Director of Regulatory Affairs and Policy, Western U.S.  
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