BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION.

DOCKETS UE-170033 and UG-170034 (Consolidated)

Complainant,

V.

PETITION TO INTERVENE OF **INVENERGY LLC**

PUGET SOUND ENERGY,

Respondent.

- 1. Pursuant to WAC § 480-07-355, Invenergy LLC ("Invenergy") hereby petitions the Washington Utilities and Transportation Commission ("Commission") for leave to intervene in the above-referenced docket, as an intervenor with full party status as described in WAC § 480-07-340.
- 2. Invenergy's business address is:

Invenergy LLC 1 S. Wacker, Suite 1800 Chicago, IL 60606 nluckey@invenergyllc.com 312-582-1749

3. Marten Law will represent Invenergy in this proceeding. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Nicole Luckey Senior Manager, Regulatory Affairs Invenergy LLC 1 S. Wacker, Suite 1800 Chicago, IL 60606 Telephone: (312) 582-1749

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- 4. Invenergy LLC is the largest independent, privately held renewable energy provider in North America. To date, Invenergy has developed 7,803 MW of wind, consisting of over 6,364 MW of projects in operation and more than 1,439 MW in construction and in advanced development. To date, Invenergy has also developed over 159 MW of solar projects. Invenergy's thermal portfolio includes over 5,519 MW of natural gas capacity. Operating projects total 3,159 MW, with an additional 2,360 MW in construction and advanced development. Invenergy has developed more than 88 MW of energy storage projects to date and has over 68 MW of operating energy storage projects. In Washington State, Invenergy owns and operates the 90MW Vantage Wind Farm located in Kittitas County and the 620 MW Natural Gas Combined Cycle Plant, Grays Harbor Energy Center, located in Grays Harbor County.
- 5. Invenergy assets produce power for the Columbia Grid, which provides power to the Puget Sound Energy ("PSE") service area and will be significantly impacted by any PSE decisions concerning the decommissioning and shut down of Colstrip Units 1 & 2 that may be made as a result of the Commission's findings in this proceeding.
- 6. Invenergy requests the right to address the very narrow issue of PSE's plan for the future of Colstrip to inform the Commission of their interests that may be impacted by the eventual decommissioning and shut down of Units 1 & 2.
- 7. Invenergy does not propose to broaden the issues in this proceeding.
- 8. Pursuant to WAC § 480-07-355(1)(b), this is a "late-filed petition to intervene," which the Commission will grant "only on a showing of good cause, including a satisfactory explanation of why the person did not timely file a petition."
- 9. Invenergy is an active participant in the Advisory Group for the Puget Sound Energy 2017 Electric Integrated Resource Plan (UE-160918). Through participation in that Advisory Group, Invenergy only recently learned that this consolidated docket may address the eventual decommissioning and shutdown of Colstrip Units 1 & 2, as indicated in the pre-filed direct testimony of Ronald J. Roberts. Invenergy expeditiously retained counsel and filed this Petition to Intervene. As noted above, Invenergy does not seek to broaden the issues in this proceeding.

10. WHEREFORE, Invenergy 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 10th day of February, 2017.

Respectfully submitted,

Richard H. Allan Marten Law

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