

# Sanger Law PC

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November 2, 2016

Via E-filing and UPS

Mr. Steven V. King  
Executive Director  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
P. O. Box 47250  
Olympia, WA 98504-7250

Attn: Filing Center

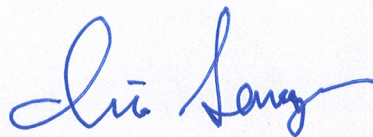
RE: In the Matter of WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION v. PUGET SOUND ENERGY  
Docket No. UE-161123

Dear Mr. King:

Please find for filing in the above-referenced docket the original and one (1) copy of the Petition to Intervene of the Northwest and Intermountain Power Producers Coalition.

Thank you for your assistance. Please do not hesitate to contact me with any questions.

Sincerely,



Irion A. Sanger

cc: Service List

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NO. UE-161123
	)	
Complainant,	)	
	)	PETITION TO INTERVENE OF THE
v.	)	NORTHWEST AND
	)	INTERMOUNTAIN POWER
PUGET SOUND ENERGY,	)	PRODUCERS COALITION
	)	
Respondent.	)	
	)	

1. Pursuant to Washington Administrative Code (“WAC”) § 480-07-355, the Northwest and Intermountain Power Producers Coalition (“NIPPC”) petitions the Washington Utilities and Transportation Commission (the “Commission”) to intervene with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, NIPPC states as follows:

2. The name and address of NIPPC is:

Northwest and Intermountain Power Producers Coalition  
Robert D. Kahn  
Executive Director  
P.O. Box 504  
Mercer Island, Washington 98040  
Telephone: (206) 236-7200  
rkahn@nippc.org

3. NIPPC will be represented in this proceeding by Sanger Law, PC. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Robert D. Kahn  
Northwest and Intermountain  
Power Producers Coalition  
P.O. Box 504  
Mercer Island, WA 98040  
rkahn@nippc.org

Irion Sanger  
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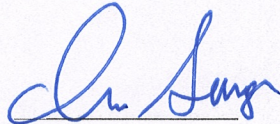
Sidney Villanueva  
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1117 SE 53rd Avenue  
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4. NIPPC is a trade association whose members include private industry participants active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of independent power producers and marketers in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest.
5. NIPPC has participated in numerous state and federal regulatory proceedings intended to promote competitive markets, including those relating to voluntary renewable tariffs, direct access, competitive bidding requirements, and utility requests for proposals. NIPPC's attorneys have also participated in numerous state regulatory proceedings, including those that created Puget Sound Energy's ("PSE") current large customer direct access program.
6. PSE proposed Schedule No. 451: Large Customer Retail Wheeling, filed October 7, 2016, could substantially and directly affect NIPPC members who sell power in Washington. PSE requests that the Commission approve a new retail wheeling service for large non-core customers.

7. NIPPC generally supports direct access because it lowers end use consumer retail rates, and fosters competitive power markets. NIPPC's members' ability to participate in competitive energy markets and sell power to Washington customers may be directly impacted by this proceeding. Any Commission determination made in connection with these proceedings could impact NIPPC's current and future members. Accordingly, NIPPC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party.
8. NIPPC plans to participate and review PSE's proposed filings to ensure it complies with Washington and federal law. NIPPC intends to participate in all aspect of this particular proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Without the opportunity to intervene herein, NIPPC would be without a manner or means of participating in the lawful determination of issues that may affect NIPPC members.
9. 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 2nd day of November, 2016.

Respectfully submitted,



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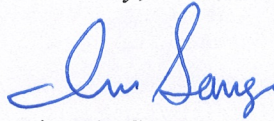
Of Attorneys for the Northwest and Intermountain  
Power Producers Coalition

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document on behalf of the Northwest and Intermountain Power Producers upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail.

Dated at Portland, Oregon, this 2nd day of November, 2016.

Sincerely,



Irion A. Sanger

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