**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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

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

1. 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 Irion Sanger

Northwest and Intermountain Sanger Law, P.C.

Power Producers Coalition 1117 SE 53rd Avenue

P.O. Box 504 Portland, OR 97215

Mercer Island, WA 98040 irion@sanger-law.com

rkahn@nippc.org

Sidney Villanueva

Sanger Law, P.C.

1117 SE 53rd Avenue

Portland, OR 97215

sidney@sanger-law.com

|  |
| --- |
|  |

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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,

*\_\_*\_\_\_\_\_\_\_\_\_\_\_\_

Irion A. Sanger

Sidney Villanueva

Sanger Law, PC

1117 SE 53rd Avenue

Portland, OR 97215

Telephone: 503-756-7533

Fax: 503-334-2235

irion@sanger-law.com

Of Attorneys for the Northwest and Intermountain Power Producers Coalition