

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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FILED
NOV 16 2000

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Avista Corporation,)
The Bonneville Power Administration,)
Idaho Power Company,)
The Montana Power Company,)
Nevada Power Company, PacifiCorp,)
Portland General Electric Company,)
Puget Sound Energy, Inc.,)
Sierra Pacific Power Company)

FEDERAL ENERGY
REGULATORY
COMMISSION

Docket No. RT01-35-000

MOTION TO INTERVENE OF
THE CALIFORNIA DEPARTMENT OF WATER RESOURCES

Pursuant to sections 205 and 206 of the Federal Power Act and Rule 214 of the Commission's Rules of Practice and Procedure the Department of Water Resources of the State of California (DWR) moves to intervene in the above-captioned matter. DWR reserves the right to file a protest or supplemental comments in this proceeding.

On October 23, 2000, Avista Corporation, the Bonneville Power Administration, Idaho Power Company, The Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc. and Sierra Pacific Power Company (collectively, the filing utilities) filed a Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000 at the Federal Energy Regulatory Commission (Commission) under the Commission's Order 2000 and in accordance with 18 CFR 385.207(a)(2). Among other things, this filing describes the filing utilities proposal to form a regional transmission organization (referred to as RTO West) that complies with the requirements of the Commission's Order 2000. The filing also requests an expedited

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declaratory order from the Commission that certain aspects of the proposal, including the proposed governance documents and the scope and configuration of RTO West, are in accordance with applicable requirements under Order 2000.

The persons to whom correspondence, pleadings and other papers regarding this proceeding should be addressed and the persons whose names are to be placed on the Commission's official service list are designated as follows pursuant to Rule 203:

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The Department of Water Resources is an agency of the State of California, headquartered in Sacramento. It is responsible for monitoring, conserving and developing California's water resources, providing public safety and preventing property damage related to water resources. A primary responsibility of the Department is the construction, operation, and maintenance of the California State Water Project (SWP), consisting of an integrated network of aqueducts, pumping facilities, reservoirs and

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hydroelectric facilities that deliver water to much of California. DWR's primary operational functions reside in the wholesale water utility area.

The SWP is one of the largest water storage and transportation projects undertaken in history and is the largest single power and transmission customer in California. DWR provides approximately one-half of the power for operating the SWP from its own generation facilities. The balance is obtained through bulk power transactions and exchanges with utilities in California, the Pacific Northwest, and the Southwest. DWR's power generation and other bulk power transactions, including transmission services, occur at the wholesale level and are coordinated and scheduled with the appropriate control area operators in California, Nevada, the Pacific Northwest and the Southwest.

This proceeding concerns a Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000. As California's largest single bulk transmission customer and largest single user of power, DWR is vitally interested in and affected by any developments regarding transmission and power transactions on the California grid. DWR uses transmission that would be subject to RTO West, and would be affected by its operations, particularly as regards subjects addressed in this docket. Thus DWR may be affected by the outcome of the above-captioned docket.

Accordingly, DWR respectfully requests that it be granted intervenor status, and be permitted to participate fully in this proceeding to protect its interests. As the single largest user of electric power in the State, the DWR's participation in this case is in the public interest. No other party can represent the DWR's interest. DWR is not a municipal system, it has no

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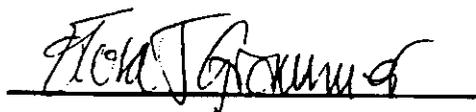
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retail customers, its pumping loads are not comparable to municipal loads, it is not primarily engaged in power sales or purchases, and it provides significant support to the California electric grid through its provision of ancillary services and reliability support.

Wherefore, the Department of Water Resources of the State of California respectfully requests that the Commission grant its motion to intervene and that afford it full status as a party to this proceeding.

Respectfully submitted this 15th day of November, 2000.

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Certificate of Service

I hereby certify that I have served the foregoing document by first class mail or fax upon each party identified in the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC this 15th day of November, 2000.



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