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RAYMOND S. KINDLEY  
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November 17, 2000

Mr. David Boergers, Secretary  
Federal Energy Regulatory Commission  
Room 1 A East  
888 1st Street NE  
Washington DC 20426

Re: Docket Number RT01-35-000  
Our File No. 071000-119321

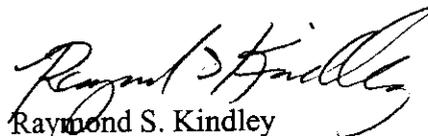
Dear Mr. Boergers:

Enclosed for filing are an original and 14 copies of Public Generating Pool, Public Utility District No. 1 of Douglas County, Washington, Public Utility District No. 2 of Grant County, Washington, and Public Utility District No. 1 of Pend Oreille County, Washington's, Motions to Intervene in the above noted docket.

Please date/time stamp the additional copy of this letter and Motions and return it to me in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

  
Raymond S. Kindley

RSK:ard  
Enclosures  
cc: PGP Operating Committee  
PGP Administrative Committee

PORTLAND OREGON 503 222-9981 ■ BEND OREGON 541 330-0904 ■ SEATTLE WASHINGTON 206 622-1711 ■ VANCOUVER WASHINGTON 360 694-7551 ■ WASHINGTON DISTRICT OF COLUMBIA 202 661-7060

PDX/071000/119321/RSK/827683.1

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Avista Corporation	)	
Bonneville Power Administration	)	Docket No. RT01-35-000
Idaho Power Company	)	
The Montana Power Company	)	
Nevada Power Company	)	
PacifiCorp	)	
Portland General Electric Company	)	
Puget Sound Energy, Inc.	)	
Sierra Pacific Power Company	)	

**MOTION TO INTERVENE  
OF  
PUBLIC UTILITY DISTRICT NO. 1 OF COWLITZ COUNTY, WASHINGTON**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214 (2000), Public Utility District No. 2 of Cowlitz, Washington ("District") hereby moves for intervention in the above-captioned docket. In support of its motion, the District states as follows:

**COMMUNICATION INFORMATION**

Communications and correspondence regarding this proceeding should be directed to:

Gary Huhta  
Public Utility District No. 1 of Cowlitz County  
961 12<sup>th</sup> Avenue  
Box 3007  
Longview WA 98632  
(360) 423-2210 (voice)  
(360) 577-7559 (fax)  
ghuhta@cowlitzpud.org

## **INTERVENTOR**

The District is a publicly-owned municipal corporation organized in the state of Washington. It has interest in federally licensed hydroelectric projects located in the state of Washington. Under federal statutes, the District is a public preference customer of the Bonneville Power Administration.

## **BACKGROUND OF PROCEEDING**

Avista Corporation, 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 ("Filing Utilities") submitted to the Commission on October 16, 2000 a proposed compliance filing pursuant to Order No. 2000. The Filing Utilities also submitted on October 23, 2000 a Supplemental Compliance Filing and Request for Declaratory Order pursuant to Order No. 2000, in accord with 18 C.F.R. § 385.207(a)(2). The Filing Parties propose to form a regional transmission organization in the Pacific Northwest and sections of the Southwest. The Filing Utilities refer to the proposed organization as RTO West. The Filing Utilities requested an expedited declaratory order from the Commission. They want the Commission to decide that various aspects of their proposal, i.e., scope, configuration and governance documents, comply with Order No. 2000.

## **DISTRICT'S INTERESTS**

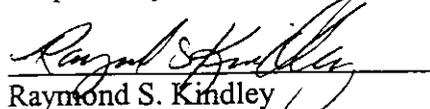
The District relies on transmission facilities owned and operated by the Bonneville Power Administration and other Filing Utilities in the Pacific Northwest to deliver and receive power. The District has entered into long-term agreements with

various members of the Filing Utilities for transmission service. Also, the District is periodically a competitor of the Filing Utilities in power markets in the Pacific Northwest. The Commission's decision regarding the Filing Utilities' requests will have a direct and substantial impact on the District's interests and operations.

The District participated in the public processes regarding the development of RTO West primarily through its membership in the Public Generating Pool. The District joins other Public Generating Pool members in their joint submission to the Commission regarding their intervention and protest in this proceeding. Public Generating Pool members decided to participate jointly in this proceeding for administrative convenience and to reduce costs. The District intends to rely on the Public Generating Pool to represent the Public Generation Pool members' common interests in this proceeding. The District, however, is a party of interest in its own right and wants to preserve its independent status and interests as an individual intervening party. Therefore, the District submits that its intervention in this proceeding is in the public interest.

WHEREFORE, the District moves the Commission to grant its invention.

Respectfully submitted,



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Of Attorneys for District  
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November 17, 2000

**CERTIFICATE OF MAILING (SERVICE LIST)**

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

DATED at Portland, Oregon, this 17<sup>th</sup> day of November, 2000.

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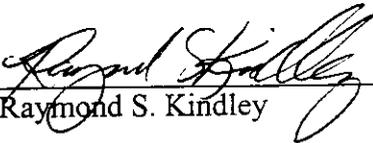
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