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UNITED STATES OF AMERICA ,  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

FILED  
OFFICE OF THE SECRETARY  
NOV 20 AM 11: 21  
FEDERAL ENERGY  
REGULATORY  
COMMISSION

- Avista Corporation )
- 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 )

Docket No. RT01-35-000

MOTION TO INTERVENE  
OF  
PUBLIC UTILITY DISTRICT NO. 1 OF DOUGLAS 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. 1 of Douglas, Washington ("District") hereby moves for intervention in the above-captioned docket. In support of its motion, the District states as follows:

COMMUNICATION INFORMATION

Communication and correspondence regarding this proceeding should be directed to:

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00124-0174-1

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### **INTERVENTOR**

The District is a publicly-owned municipal corporation in the state of Washington. It owns and operates a federally licensed hydroelectric project located on the Columbia River 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 and is a party to 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 Commissioner's decision regarding the Filing Utilities' requests will have a direct and substantial impact to its interests and operators.

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 decided to file jointly for administrative convenience and to reduce the costs. The District intends to rely on the Public Generating Pool to represent the Public Generation Pool members' common interest 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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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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