

ORIGINAL

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

FILED
OFFICE OF THE SECRETARY
NOV 20 PM 1:50
FEDERAL ENERGY

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

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

Docket No. RT01-15-000

**MOTION TO INTERVENE AND COMMENTS OF
EDISON MISSION ENERGY
AND
EDISON MISSION MARKETING & TRADING, INC.**

Pursuant to Rule 214 (18 C.F.R. § 385.214) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("FERC" or "Commission"), Edison Mission Energy ("EME") and Edison Mission Marketing & Trading, Inc. ("EMMT") hereby move to Intervene and Comment in the above-captioned proceedings.

I. MOTION TO INTERVENE

EME owns and operates generation assets in various geographical areas of the U.S. and in foreign countries. EME owns, or is considering construction or purchase of electric power generation assets in the northwestern United States. Accordingly, EME has a direct and substantial interest in the outcome of these proceedings.

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EMMT is a national power marketer that buys and sells at wholesale substantial volumes of electric energy and capacity in the northwestern United States. Conditions that limit the free flow of electric energy across electric transmission systems negatively impact EMMT's ability to deliver low-cost electric power to its customers and to compete with other market participants. Accordingly, EMMT has a direct and substantial interest in the outcome of these proceedings. EMMT submits that good cause exists for granting this timely motion to intervene, and that its intervention is in the public interest, and should thus be granted.

All pleadings, correspondence and other communications concerning these proceedings should be directed to:

John P. Mathis
Vice President and Associate
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Edison Mission Energy
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Washington, D.C. 20004

R. Geoffrey Mathews
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Edison Mission Marketing &
Trading, Inc.
160 Federal Street
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EME and EMMT (together, "Movants") request that the above names be placed on the Commission's official service list in these proceedings.

II. COMMENTS

EME and EMMT wish to state their support for the Motion to Intervene and Comment ("the EPSA Motion") of the Electric Power Supply Association ("EPSA") in these matters. Movants applaud the efforts of the filing utilities to comply with FERC Order 2000 and encourage the filing utilities to submit a final filing that conforms with the recommendations set forth in this motion and the EPSA Motion to Intervene and Comment. Movants agree with the positions stated by EPSA, namely that the filing

utilities must finalize their filing before it can be approved by the Commission, that all transmission facilities of the filing entities must be controlled by the RTO if it is to have the ability to manage congestion and provide for interconnection by generators, that the proposed auction of fixed transmission rights may favor existing transmission owners thus limiting competition, that it is premature for the Commission to rule on the independence of TransConnect LLC, an independent transmission company, because the filing does not clearly delineate between the functions that will be performed by TransConnect LLC and those that will be performed by RTO West, and that although TransConnect LLC may be independent it should not have authority over transmission planning.

WHEREFORE, EME and EMMT respectfully request that the Commission grant their motion to intervene and permit them to participate as a party to the proceedings in this docket and any docket that may be consolidated with it.

Respectfully submitted,



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for Edison Mission Energy and
Edison Mission Marketing & Trading, Inc.
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Dated: 11/20/00
Washington, DC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document in accordance with the requirement of Rule 2010 of the Commissions Rules of Practice.

Dated at Washington, DC, this 20th day of November, 2000.


Michelle D. Simmons

Service List for RT01-15

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