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November 17, 2000

SENT VIA FEDEX

Mr. David Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington D.C. 20426

Re: FERC Docket Nos. RT01-35-000
Motion to Intervene of Eugene Water & Electric Board (EWEB)

Dear Mr. Boergers:

Please find enclosed for filing, the original and fourteen (14) copies of the MOTION TO INTERVENE OF EUGENE WATER & ELECTRIC BOARD (EWEB) in the above-captioned matter.

Please acknowledge receipt of this filing by date-file stamping the additional copy and return to my attention in the self-addressed stamped envelope enclosed.

Thank you in advance for your assistance.

Very truly yours,



Jim Deason

JRD:tr
Enclosures
cc: Service List

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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

Docket No. RT01-35-000

MOTION TO INTERVENE OF EUGENE WATER & ELECTRIC BOARD

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 & .214, the City of Eugene, acting by and through the Eugene Water & Electric Board ("EWEB"), hereby moves the Commission for leave to intervene in the above-captioned proceeding as full party with all rights and privileges to appear and participate. In support of its Motion, EWEB states as follows:

I.

COMMUNICATIONS

The following person should be included on the official service list in this proceeding, and all communications concerning this motion should be addressed to the following:

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II.

DESCRIPTION OF EWEB

EWEB is a municipal corporation organized and existing under the laws of the State of Oregon, having its principal place of business in Eugene, Oregon. EWEB owns and operates facilities in Lane County, Oregon that it uses for the generation and distribution of electric power to approximately 78,000 customers, including approximately 69,000 residential customers. EWEB also owns and relies upon generating sources located outside its immediate service territory, in areas as widespread as Washington, Oregon, Idaho and Wyoming, making it highly dependent upon reliable and reasonably priced transmission service. EWEB purchases a substantial amount of transmission services from the utilities seeking Commission action in this proceeding.

III.
INTERVENTION

EWEB believes the Regional Transmission Organization (“RTO”) filing at issue in this proceeding, known as “RTO West,” may fail in certain particulars to meet the requirements of the Commission’s Order No. 2000 and may be otherwise unjust and unreasonable.

EWEB has a direct interest in this proceeding that is not adequately represented by any other party because EWEB relies upon the transmission system of the Bonneville Power Administration, and to a lesser extent the transmission systems of PacifiCorp and Portland General Electric, to move nearly all of the electric power used by the citizens of Eugene from generating sources that are remote from Eugene. To the extent that the rates, terms and conditions for transmission service offered by RTO West violate Order No. 2000 or are otherwise unjust and unreasonable, EWEB’s ability to supply power to its customers, and to participate in open access under the Commission’s Order No. 888, is substantially impaired.

Hence, EWEB seeks to vindicate the interests of its consumers of transmission services in this proceeding and its intervention is therefore in the public interest.

WHEREFORE, EWEB respectfully requests that this motion for intervention be granted and that it be allowed to participate as a party in this proceeding.

Respectfully submitted,

CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP


By: James R. Deason
Of Attorneys for Eugene Water & Electric Board

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **MOTION TO INTERVENE OF EUGENE WATER & ELECTRIC BOARD (EWEB)** to be served, via first-class U.S. Mail, upon each person designated on the official service list compiled by the Secretary in this proceeding.

DATED at Portland, Oregon as of the 17TH day of November, 2000.



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**FERC DOCKET NO. RT01-35-000
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