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November 17, 2000

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

Re: Federal Energy Regulatory Commission
FERC Docket No. RTO-35-000

Dear Mr. Boergers:

Enclosed are the original and 14 copies of the Motion to Intervene of the Idaho Energy Authority in the above-referenced docket. We also enclose an extra copy of the Motion, which we will appreciate your file-stamping to our offices in the envelope provided.

Thank you for your assistance in this matter.

Very truly yours,

Peter J. Richardson

ccs: Parties of Record

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Attorneys for the Idaho Energy
Authority, Inc.

UNITED STATES OF AMERICAN
BEFORE
THE FEDERAL ENERGY REGULATORY COMMISSION

AVISTA CORPORATION, BONNEVILLE)	
POWER ADMINISTRATION, IDAHO)	DOCKET NO. RTO-35-000
POWER COMPANY, MONTANA POWER)	
COMPANY, NEVADA POWER COMPANY,)	PETITION TO INTERVENE
PACIFICORP, PORTLAND GENERAL)	OF THE IDAHO ENERGY
ELECTRIC COMPANY, PUGET SOUND)	AUTHORITY
ENERGY, INC., and SIERRA PACIFIC)	
<u>POWER COMPANY</u>)	

COMES NOW, the Idaho Energy Authority, (“Intervenor or IDEA,”) and pursuant to Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 214, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Idaho Energy Authority
C/o Mark Gendron
PO Box 50220
140 South Capital Avenue
Idaho Falls, Idaho 83402
Phone: (208) 529-1430
Fax: (208) 529-1435
markg@ci.idaho-falls.id.us

This Intervenor will be represented herein by:

Peter J. Richardson
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson and Mark Gendron as noted above.

2. On October 16, 2000, the above captioned utilities (the "Filing Utilities") filed an Alternative Filing Pursuant to Order No. 2000. On or about October 23, 2000, the Filing Utilities filed a Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order No. 2000 with the Commission (the "RTO West Filing.") Said filings were assigned the above reference docket number.

3. This Intervenor, the Idaho Energy Authority, is a duly organized Nonprofit Corporation under the laws of the State of Idaho. The members of IDEA that are engaged in the business of electric utility distribution include fifteen electric distribution systems that are either cooperatively or municipally owned and operated. IDEA's utility members are all transmission

dependent utilities as they must rely on the transmission systems of some of the Filing Utilities and will rely on the transmission system under the governance of RTO West should it come to fruition. A complete list of the members of IDEA are attached as Exhibit One to this Motion to Intervene. IDEA claims a direct and substantial interest in this proceeding in that, the cost as well as the reliability of their electric service may be affected by the outcome of this proceeding. Some of the Filing Utilities own facilities that intervene between the Bonneville transmission system and the points of receipt for IDEA's members. In these cases, Bonneville contracts with the relevant Filing Utility in order to obtain transmission service to the relevant IDEA member. Such transmission contracts between Bonneville and an individual Filing Utility are known as "general transfer agreements."

4. This Intervenor, in its capacity as a representative of IDEA's members' interests, intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. IDEA's position in this docket is fully set forth in the protest filed this day by IDEA *et. al.* which is incorporated herein by this reference. IDEA takes the position that the proposed governance structure of the RTO fails to meet the Commission's regional transmission organization policy. IDEA opposes the Filing Utilities request for a declaratory order on said subject. Furthermore, IDEA takes the position that the Transmission Operating Agreement and the Agreement to Suspend Provisions of Pre-Existing Transmission Agreements are substantially incomplete which requires this Commission to deny the Filing Utilities request for a declaratory judgment.

6. IDEA's participation in this proceeding furthers the public interest because it represents the collective interests of the consumer on its members' electric systems.

WHEREFORE, the Idaho Energy Authority respectfully requests that this Commission grant its Motion to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 17th day of November, 2000.

Richardson & O'Leary PLLC

By 
Peter J. Richardson
Attorneys for the Idaho Energy Authority

EXHIBIT I

**IDAHO ENERGY AUTHORITY
MEMBERS**

City of Burley
Burley ID 83318

South Side Electric Lines, Inc.
Declo ID 83323

City of Declo
Declo ID 83323

United Electric Cooperative, Inc.
Heyburn ID 83326

East End Mutual Electric Company, LTD
Rupert ID 83350

UAMPS
Salt Lake City UT 84121

Farmer's Electric Co.
Heyburn ID 83336

Fall River Rural Electric Cooperative, Inc.
Ashton ID 83420

City of Heyburn
Heyburn ID 83336

Idaho County Light & Power Cooperative, Inc.
Grangeville ID 83530

Idaho Falls Power
Idaho Falls ID 83402

Lower Valley Energy
Afton WY 83310

Riverside Electric Company
Rupert ID 83350

City of Rupert
Rupert ID 83350

Salmon River Electric Cooperative, Inc.
Challis ID 83226

City of Soda Springs
Soda Springs ID 83276

Exhibit I