

Davison Van Cleve PC

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1300 SW Fifth Avenue
Portland, OR 97201

Irion A. Sanger

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November 17, 2000

Via Federal Express

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

Re: Avista Corporation, Bonneville Power Administration, Idaho Power Company, Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc., Sierra Pacific Power Company
Regional Transmission Organization Filing
FERC Docket No. RT01-35-000

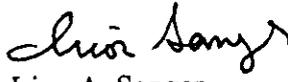
Dear Mr. Boergers:

Enclosed for filing in the above captioned proceeding, please find the original and 15 copies of the Motion to Intervene of the Industrial Customers of Northwest Utilities.

Please return one file-stamped copy of the document in the self-addressed, stamped envelope provided.

Thank you for your assistance.

Sincerely yours,


Irion A. Sanger

cc: Service List

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Avista Corporation)	
Bonneville Power Administration)	
Idaho Power Company)	
The Montana Power Company)	
Nevada Power Company)	Docket No. RT01-35-000
PacifiCorp)	
Portland General Electric Company)	
Puget Sound Energy, Inc.)	
Sierra Pacific Power Company)	
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**MOTION TO INTERVENE OF
THE INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES**

The Industrial Customers of Northwest Utilities ("ICNU"), by and through counsel, Irion A. Sanger of Davison Van Cleve, P.C., 1300 SW Fifth Avenue, Suite 2915, Portland, Oregon 97201, files this Motion to Intervene and says as follows:

I. PRELIMINARY STATEMENT

1. This Motion to Intervene is filed pursuant to Federal Power Act, 16 U.S.C. § 824, pursuant to Sections 212 and Rule 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214 (2000), pursuant to the Notice of Filing, issued on October 24, 2000.

2. The exact name and address of ICNU is:

Ken Canon
Industrial Customers of Northwest Utilities
825 NE Multnomah
Suite 180
Portland, Oregon 97232-2158

MOTION TO INTERVENE OF ICNU - 1

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3. The persons to whom correspondence, pleadings and other papers regarding this proceeding should be addressed, and whose names are to be placed on the Commission's official service list on behalf of ICNU, are designated as follows, in accordance with Rule 203, 18 C.F.R. § 385.203:

Irion A. Sanger	Lincoln Wolverton
Davison Van Cleve, P.C.	East Fork Economics
1300 SW Fifth Avenue, Suite 2915	PO Box 620
Portland, OR 97201	La Center, WA 98629
E-mail: mail@dvclaw.com	E-mail: lwolv@worldaccessnet.com
Telephone: 503-241-7242	Telephone: 503-232-6155
Facsimile: 503-241-8160	Facsimile: 360-737-7628

II. NATURE OF THE PARTIES

4. ICNU is an incorporated non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU's members is included as Attachment A.

III. BACKGROUND

5. On October 23, 2000, Avista Corporation, Bonneville Power Administration, Idaho Power Company, Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc., and Sierra Pacific Power Company (collectively, "the Companies") filed with the Commission their Supplemental Compliance Filing and Request for Declaratory Order Pursuant to FERC Order 2000 ("Supplemental Filing"). Regional Transmission Organizations, Order No. 2000, III F.E.R.C. Stats. & Regs. ¶ 31,089 (2000), *order on reh'g*, Order No. 2000-A, III F.E.R.C. Stats. & Regs. ¶ 31,092 (2000).

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6. Pursuant to the Commission's Notice of Filing issued on October 16, 2000, Motions to Intervene in this proceeding or Protests are due on or before November 20, 2000.

IV. MOTION TO INTERVENE

7. ICNU has a substantial interest in the outcome of this proceeding. ICNU's members are large consumers of electricity that utilize the transmission services of the Companies. Furthermore, in the Northwest, certain of ICNU members have the ability to directly secure their electric power through retail access programs. Thus, transmission pricing, availability and terms and conditions of service are important issues for ICNU's members. Therefore, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party.

8. ICNU and its members may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding with full rights to participate as a party to protect its interests as they may appear. ICNU reserves the right to address any issues which may develop or are identified after discovery, or during the hearing. ICNU's failure to raise any other particular issues at this time should not be construed as acceptance of, or acquiescence regarding any aspect of the Supplemental Filing.

9. ICNU believes its participation in this proceeding will assist the Commission in its consideration of the customer impacts of the compliance filing. Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

MOTION TO INTERVENE OF ICNU - 3

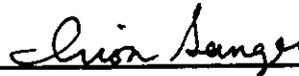
V. CONCLUSION

WHEREFORE, for the foregoing reasons ICNU respectfully requests that the Commission issue an order:

1. Granting this Motion to Intervene and allowing ICNU to participate in this proceeding for all purposes;
2. Adding the above-named individuals to the official service list; and
3. Granting such other and further relief as the Commission deems just and reasonable.

Dated: November 17, 2000.

Respectfully submitted,



Irion A. Sanger
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Email: mail@dvclaw.com

Of Attorneys for The Industrial Customers of
Northwest Utilities

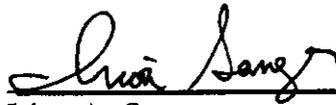
ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Agilent Technologies
Air Liquide
Air Products
BP-Amoco
BFGoodrich Kalama, Inc.
Bellingham Cold Storage
Birmingham Steel
Blue Heron Paper Company
Boeing
Boise Cascade
CNC Containers, Northwest
Coastal St. Helens Chemical
Daishowa America
Davidson Industries, Inc.
Eagle-Picher Minerals, Inc.
Equilon Enterprises LLC
Evanite Fiber
Fort James Corp.
Georgia-Pacific
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
J.R. Simplot
James Hardie Gypsum Inc.
Kimberly-Clark Corporation
Lamb-Weston
Longview Fibre
Nabisco, Inc.
Norpac Foods
Oregon Steel
PCC Structurals, Inc.
Pioneer Americas, Inc .
Ponderay Newsprint Co
Pope and Talbot, Inc.
Potlatch Corporation
Simpson Paper
Simpson Timber
Tesoro Northwest Company
Wah Chang
West Linn Paper Company
Weyerhaeuser
Willamette Industries

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing ICNU Motion to Intervene upon each party on the official service list by causing the same to be mailed, postage-prepaid, through the U.S. Mail. Dated at Portland, Oregon, this 17th day of November, 2000.

A handwritten signature in cursive script, appearing to read "Irion A. Sanger", is written over a solid horizontal line.

Irion A. Sanger