

ORIGINAL
Project for
Sustainable FERC Energy Policy

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OFFICE OF THE SECRETARY
 FEDERAL ENERGY
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December 8, 2000

Delivered via Hand Delivery

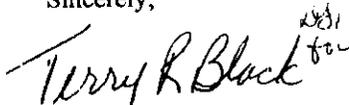
Mr. David P. Boergers, Secretary
 Federal Energy Regulatory Commission
 888 First Street, N.E., Room 1A
 Washington, D.C. 20426

RE: Docket No. RT01-35-000

Dear Mr. Boergers:

Enclosed for filing in the above referenced docket is an original and fourteen copies of the MOTION OF PUBLIC INTEREST ORGANIZATIONS TO AMEND THEIR MOTION TO INTERVENE AND PROTEST IN ORDER TO ADD AN ADDITIONAL PARTY IN INTEREST. Also enclosed is a floppy disk with a copy of the document in MSWord format. Thank you.

Sincerely,



Terry R. Black
 Attorney

Copy: Persons on Service List

0012110281-1

FERC DOCKETED

ORIGINAL**UNITED STATES OF AMERICA
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., and
Sierra Pacific Power Company

Docket No. RT01-35-000

OFFICE OF THE SECRETARY
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FEDERAL ENERGY
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**MOTION OF PUBLIC INTEREST ORGANIZATIONS
TO AMEND THEIR MOTION TO INTERVENE AND PROTEST
IN ORDER TO ADD AN ADDITIONAL PARTY IN INTEREST**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §

385.212, **Northwest Energy Coalition, Renewable Northwest Project, Natural Resources**

Defense Council, and Project for Sustainable FERC Energy Policy ("Public Interest

Organizations" or "PIOs") move to amend their Motion to Intervene and Protest in the above-

captioned proceeding in order to add **American Wind Energy Association (AWEA)** as a party

in interest to their pleading. The following additional persons are designated to receive service

and communications in this proceeding on behalf of the PIOs and AWEA:

Christopher T. Ellison
Lynn M. Haug
Ellison, Schneider & Harris
2015 H Street
Sacramento, CA 95814
(916) 447-2166 phone
(916) 447-3512 fax

In support of their motion, PIOs and AWEA state as follows:

1. The American Wind Energy Association is a national trade association that represents wind power plant developers, wind turbine manufacturers, utilities, consultants, insurers, financiers, researchers, and others involved in the wind industry. AWEA works to promote wind energy as a clean source of electricity for consumers. AWEA has members who are either actively developing or contemplating new generating projects that would be interconnected with RTO West transmission owners and that would require transmission services governed by the RTO West proposals that are the subject of this proceeding. AWEA is interested in ensuring that the unique interests of wind generation providers are fairly considered in the development of RTO West. Thus, AWEA's interest in the outcome of this proceedings is direct and substantial.

2. The addition of AWEA as a party in interest with the PIOs in this proceeding will not delay or disrupt the proceeding; nor will it prejudice or unduly burden the Filing Utilities or other parties. In addition, AWEA's participation would serve the public interest.

WHEREFORE, PIOs and AWEA respectfully request that this motion be granted and that the Commission add AWEA as a party in interest to the Intervention Motion and Protest of the Public Interest Organizations in this docket.

Respectfully submitted, *of*

Terry R. Black *for*

Terry R. Black, Attorney for
PUBLIC INTEREST ORGANIZATIONS

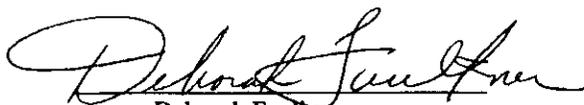
Christopher T. Ellison
Lynn M. Haug
Attorneys for
AMERICAN WIND ENERGY ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that I have this day served, via first class mail, the foregoing MOTION OF PUBLIC INTEREST ORGANIZATIONS TO AMEND THEIR MOTION TO INTERVENE AND PROTEST IN ORDER TO ADD AN ADDITIONAL PARTY IN INTEREST upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 8th day of December, 2000.

Signed:



Deborah Faulkner
NRDC, Suite 400
1200 New York Ave., NW
Washington, D.C. 20005
Phone: 202/289-6868

