



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ P. O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

00 NOV 24 AM 9:55

November 20, 2000

VIA HAND DELIVERY

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

**Re: Avista Corporation, et al.
Docket No. RT01-35-000**

Dear Mr. Boergers:

Enclosed for filing please find the original and fourteen copies of the Motion to Intervene of The Sacramento Municipal Utility District.

Also enclosed are two additional copies of this filing which we ask that you time stamp and give to the messenger for return to our office.

Respectfully submitted,

Arlen Orchard / MAg

Arlen Orchard

Enclosures

cc: All Parties

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

Avista Corporation)	
)	
The 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)	

**MOTION TO INTERVENE
OF
THE SACRAMENTO MUNICIPAL UTILITY DISTRICT**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("FERC" or the "Commission"), 18 C.F.R. §385.214 (2000), the Sacramento Municipal Utility District ("SMUD") hereby submits this Motion to Intervene in the Regional Transmission Organization ("RTO") filing by 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 (collectively "the filing utilities") pursuant to the Commission's Order No. 2000 in the above-referenced docket on October 23, 2000.

I. COMMUNICATIONS

The names and offices of persons to whom correspondence in regard to this proceeding should be addressed are as follows:

Dana Appling, Esq.
Arlen Orchard, Esq.
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817-1899
(916) 732-6123
(916) 732-6581 (Fax)

II. BASIS FOR INTERVENTION

SMUD is a customer-owned municipal utility district engaged in the generation, distribution, purchase, and sale of electric power to approximately 1.4 million consumers within its boundaries, which encompass most of the County of Sacramento and a small portion of the County of Placer, both in California. Formed in 1947, SMUD is a "municipality" as defined by Section 3(7) of the Federal Power Act, 16 U.S.C. § 796(7) (1988).

SMUD currently purchases transmission service from the Pacific Gas and Electric Company ("PG&E") under the terms of Existing Contracts and under PG&E's Transmission Owner Tariff. SMUD also takes service under the ISO Tariff and has paid

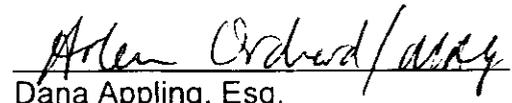
the ancillary service costs for those transactions. SMUD also purchases power and transmission from several utilities in the west under the facilitating mechanisms of the Western Systems Power Pool and various other agreements, including a number of the filing utilities. SMUD purchases more than 50 percent of the energy it needs from the power markets. In the restructured California market, SMUD uses ISO services to supplement its energy needs and is subject to the ISO's pricing policies.

The instant proceeding may substantially affect the markets for energy and ancillary services throughout the Western Systems Coordinating Council ("WSCC"). The markets for energy and capacity in California are tied directly to the markets in other portions of the Western Systems Coordinating Council, including the Pacific Northwest. This fact is evidenced by the Commission's recent order in *San Diego Gas & Electric Company*, 93 FERC ¶ 61,121 (November 1, 2000) which acknowledges the regional nature of energy prices in the west. Finally, this filing most likely will substantially affect the price of and access to power in the Pacific Northwest by SMUD. Because SMUD is a significant participant in the very markets at issue, it has an interest in this proceeding that cannot adequately be represented by any other party.

III. CONCLUSION

For the foregoing reasons, SMUD respectfully requests that the Commission grant this motion for intervention and grant other such relief as the Commission deems appropriate.

Respectfully submitted,



Dana Appling, Esq.

Arlen Orchard, Esq.

Sacramento Municipal Utility District

6201 S Street

Sacramento, CA 95817-1899

(916) 732-6123

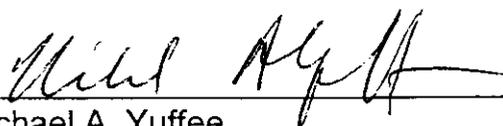
Attorneys for the Sacramento

Municipal Utility District

November 20, 2000

CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of November 2000, I have served the foregoing document upon each person designated on the official service list for this proceeding compiled by the Secretary of the Federal Energy Regulatory Commission.



Michael A. Yuffee