

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

JUN 20 AM 9:59

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

PROTEST AND MOTION FOR INTERVENTION

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.212 & .214, the Public Utility District No. 1 of Snohomish County, Washington (the "District") hereby moves for intervention in and protests the above-captioned proceeding.

I. COMMUNICATIONS

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

II. THE DISTRICT

The District is a public utility district and municipal corporation organized under the laws of the State of Washington, having its principal place of business at Everett,

Washington. The District owns and operates facilities in Snohomish County and Camano Island, Washington, for the generation and distribution of electric power and serves approximately 250,000 customers, including approximately 225,000 residential customers. It relies upon generating sources outside its immediate service territory for more than 90% of its power supply, making it highly dependent upon reliable and reasonably priced transmission service.

III. INTERVENTION

The District has a direct interest in this proceeding that is not adequately represented by any other party because the District relies upon the transmission system of the Bonneville Power Administration, and to a small extent the transmission system of Puget Sound Energy, Inc., to move nearly all of the electric power used by the citizens of Snohomish County from generating sources that are remote from the County. 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, the District'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, the District seeks to vindicate the interests of consumers of transmission services in this proceeding and its intervention is therefore in the public interest.

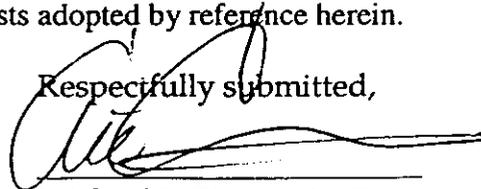
IV. THE DISTRICT'S POSITION AND PROTEST

The District believes the Regional Transmission Organization ("RTO") filing at issue in this proceeding, known as "RTO West," fails to meet the requirements of the Commission's Order No. 2000 in that: (1) it fails to meet the "independence" requirement of Order No. 2000; (2) it fails to meet Order No. 2000's "scope and configuration" requirement with respect to the facilities included in the RTO; (3) it improperly departs

from the consensus reached in the “collaborative process” undertaken in the Pacific Northwest; and, (4) lacks sufficient detail and otherwise fails to meet the other requirements of Order No. 2000. These positions are spelled out in detail in the Protest And Comment of Idaho Consumer-Owned Utilities Association, Idaho Energy Authority, Northwest Requirements Utilities, Pacific Northwest Generating Cooperative, Power Resources Managers, LLP, Public Utility District No. 1 of Snohomish County, Washington, Utah Associated Municipal Power Systems and Western Public Agencies Group filed in this docket, which the District joins and hereby adopts and incorporates herein by reference. The District is a member of the Public Power Council (“PPC”) and participated in drafting the PPC protest and comments filed in this docket. Hence, the District also hereby adopts and incorporates by reference the positions stated in the Motion to Intervene/Protest/Comments Of the Public Power Council (PPC) filed in this docket.

WHEREFORE, the Public Utility District No. 1 of Snohomish County, Washington, respectfully requests that this motion for intervention be granted and that it be allowed to participate as a party in this proceeding, and that the RTO West filing be rejected for the reasons stated in the protests adopted by reference herein.

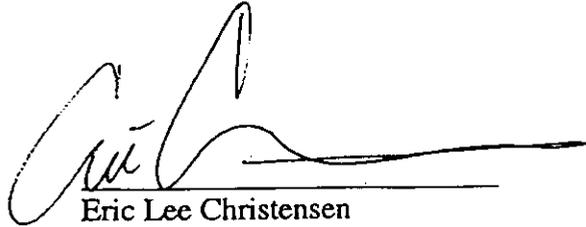
Respectfully submitted,



Michael J. Gianunzio, Esq.
General Counsel
Eric Lee Christensen
Associate General Counsel
Public Utility District No. 1
Of Snohomish County
P.O. Box 1107
2320 California Street
Everett, WA 98206-1107

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure (18 C.F.R. § 385.2010).

A handwritten signature in black ink, appearing to read 'Eric Lee Christensen', is written over a horizontal line. The signature is stylized with a large initial 'E' and a long horizontal stroke extending to the right.

Eric Lee Christensen
Associate General Counsel
Public Utility District No. 1
of Snohomish County
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2320 California Street
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