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FEDERAL ENERGY
REGULATORY
COMMISSION

**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)
- PacifiCorp)
- Portland General Electric Company)
- Puget Sound Energy, Inc.)
- Sierra Pacific Power Company)

Docket No. RT01-35-000

**MOTION TO INTERVENE AND RESERVATION OF
RIGHTS OF TENASKA, INC.**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. §§ 385.212 and 385.214 (2000), Tenaska, Inc. ("Tenaska") respectfully moves to intervene and to reserve its right to submit comments and/or a protest, if necessary, once Tenaska has completed its review and analysis of the proposal submitted in the captioned proceeding. In support thereof, Tenaska states as follows:

I.

CORRESPONDENCE AND COMMUNICATIONS

All correspondence, communications, pleadings, and other documents related to this proceeding should be addressed to the following persons:

0011210345.1

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II.

IDENTITY OF TENASKA AND TENASKA'S INTEREST IN THIS PROCEEDING

Tenaska, with its principal place of business located at 1044 North 115 Street, Suite 400, Omaha, Nebraska 68154, is a privately held corporation organized and existing under the laws of the state of Delaware. Tenaska is an independent developer and owner of power production facilities located throughout the United States and abroad.

As a developer and owner of power production facilities throughout the United States, Tenaska has a direct and substantial financial interest in this proceeding as the Commission's rulings ultimately may affect Tenaska's existing interconnection arrangements or its ability to connect its generation to the regional transmission system at issue in this docket. Tenaska will not be adequately represented by any other party in this proceeding, and unless permitted to intervene and participate fully, may be bound or adversely affected by a Commission order issued herein without an opportunity to have its views heard and considered. Thus, Tenaska's intervention is in the public interest.

III.**ORDER NO. 2000 COMPLIANCE FILING**

On October 16, 2000, 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") made compliance filings pursuant to 18 CFR 35.34(c) and the Commission's Order No. 2000. On October 23, 2000, the Filing Utilities submitted a "Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000" under the Commission's Order 2000 and in accordance with 18 C.F.R. § 385.207(a)(2). Among other things, this filing described the filing utilities' proposal to form a regional transmission organization (referred to as RTO West) that complies with the requirements of the Commission's Order 2000. The filing also requested an expedited declaratory order from the Commission that certain aspects of the proposal, including the proposed governance documents and the scope and configuration of RTO West, are in accordance with applicable requirements under Order 2000.

IV.**RESERVATION OF RIGHTS**

The Order No. 2000 compliance filing submitted in this proceeding has the potential to change dramatically the way Tenaska and other merchant power plant owners and operators structure their business operations. Tenaska has been, and is continuing to, analyze this Order No. 2000 compliance filing and the impacts it will have on Tenaska. At this time, however, Tenaska is not in a position to offer extensive comments on the proposal. Instead, Tenaska is today timely intervening in this proceeding and reserving its rights to file subsequent comments,

if necessary, once its review and analysis of the aforementioned compliance filing is complete. Tenaska notes, however, that in its initial review of the Order No. 2000 proposal, Tenaska is particularly concerned with the following issues:

- Generator ancillary services;
- Governance;
- The lack of interconnection standards and procedures;
- The lack of control of transmission facilities in the RTO;
- Rate pancaking issues; and
- The grandfathering of existing agreements.

Tenaska requests the Commission's indulgence so that it can complete its review of the compliance filing and tender its comments in the near future.

V.

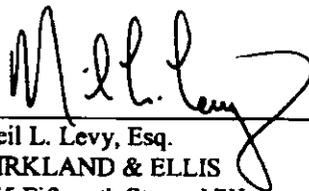
CONCLUSION

WHEREFORE, for the foregoing reasons, Tenaska respectfully requests that the Commission: (i) grant its motion to intervene with full rights as a party to participate in all stages of the proceeding as might be ordered by the Commission; (ii) permit Tenaska to conclude its review and analysis of the Order No. 2000 compliance filing and to submit additional

comments (or a protest) if necessary; and (iii) grant Tenaska such other further relief as may be required to protect its interests.

Respectfully submitted,

TENASKA, INC.

A handwritten signature in black ink, appearing to read "Neil L. Levy", is written over a horizontal line.

Neil L. Levy, Esq.
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655 Fifteenth Street, NW
Suite 1200
Washington, DC 20005

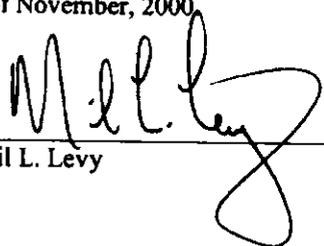
Counsel for Tenaska, Inc.

Dated: November 20, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Motion To Intervene and Reservation of Rights of Tenaska, Inc. on each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington DC, this 20th day of November, 2000.



Neil L. Levy