

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

Avista Corporation)	Docket No. RT01-35-000
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)	

**MOTION TO INTERVENE AND COMMENTS OF
TRACTEBEL ENERGY MARKETING, INC.
AND TRACTEBEL POWER, INC.**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission"), 18 C.F.R. § 385.214 (2000), Tractebel Energy Marketing, Inc. ("TEMI") and Tractebel Power, Inc. ("TPI") hereby move for leave to intervene in the above-captioned proceeding and provide their comments.

I. COMMUNICATIONS AND CORRESPONDENCE

Communications and correspondence regarding this filing should be directed to:

Andrew N. Chau, Esq.
Tractebel, Inc.
1177 West Loop South, Suite 900
Houston, TX 77027
(713) 552 – 2004
(713) 552 – 2364 (fascimile)

II. MOTION FOR LEAVE TO INTERVENE

TEMI is a power marketer authorized by the Commission to engage in wholesale electric power transactions in Docket No. ER94-142-000. TEMI actively engages in power marketing activities in the United States power markets. TPI is a developer and operator of independent power and industrial energy facilities across the country.

Given their national involvement in power marketing activities and the development of independent power and industrial energy facilities, the interests of TEMI and TPI will be directly affected by the outcome of this proceeding. TEMI and TPI may also be bound by and adversely impacted by Commission action in this proceeding. TEMI and TPI, therefore, are interested parties and their intervention and participation will be in the public interest. In addition, TEMI and TPI are not now, and will not be, adequately represented by any other party in this proceeding.

III. COMMENTS

TEMI and TPI question whether the proposed system of allocating firm transmission rights ("FTRs") may hinder the development of a competitive wholesale market. Avista proposes to allocate FTRs to transmission owners to replace firm rights under pre-existing long-term transmission agreements, to support load service obligations and obligations under bundled power sale, exchange, coordination, or other obligations not covered by a pre-existing transmission agreement. Additional FTRs will be made available without charge to transmission owners to meet transmission owners' reasonable

load growth projections. Only the transmission capability of transmission owners not allocated in the initial allocation of FTRs will be marketed by auction.¹

This policy threatens to permit incumbents to retain the lion's share of transmission capacity, hindering entry and expansion of new participants. The Commission has stated its support for "clear and tradeable rights for transmission usage" and supports the emergence of secondary markets for these transmission rights.² TEMI and TPI request that the Commission ensure that the proposal for the initial allocation and subsequent auction of FTRs does not restrict the development of secondary markets.

TEMI and TPI reserve their right to comment further in light of the short time frame for responses and the combination of length and analytical complexity of the RTO filing. The issues raised by this filing are numerous and complex, and will require a significant investment of time to carefully peruse the various proposals set forth therein.

¹ Avista Corporation, et al., Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000, Docket No. RT01-35-000, October 20, 2000, at 30.

² Order 2000 at 31,127.

IV. CONCLUSION

WHEREFORE, for the reasons set forth above, TEMI and TPI request leave to intervene in this proceeding.

Respectfully submitted,

Andrew N. Chau/nho

Andrew N. Chau, Esq.

TRACTEBEL, INC.

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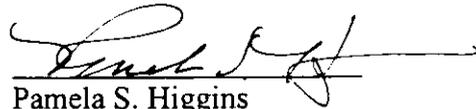
Houston, Texas 77027

(713) 552-2004

DATED: November 20, 2000

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.



Pamela S. Higgins
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November 20, 2000