

ORIGINA'

MARSH MUNDORF PRATT SULLIVAN & MCKENZIE
ATTORNEYS AT LAW - A PROFESSIONAL SERVICE CORPORATION

DOUGLAS R. MARSH
TERENCE L. MUNDORF
JEFFREY E. PRATT
WILLIAM R. SULLIVAN
PATRICK K. MCKENZIE
MARY K. STEPHENS

MILL CREEK OFFICE PARK
16000 BOTHELL-EVERETT HIGHWAY SUITE 160
MILL CREEK, WASHINGTON 98012-1514
(425) 337-2384
SEATTLE (425) 742-4545
TELEFAX (425) 337-2386
E-MAIL: mmps@millicreeklaw.com

FILED
OFFICE OF THE SECRETARY

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November 18, 2000

Via Federal Express

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

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

Dear Mr. Boergers

Please find enclosed for filing in the above captioned proceeding an original and fifteen copies of the Western Public Agencies Group's MOTION TO INTERVENE and CERTIFICATE OF SERVICE. Also enclosed is a stamped and self-addressed envelope. Please stamp the date and time of filing on one copy of the above referenced motion, and mail it to my office in the enclosed stamped, self-addressed envelope.

Thank you for your attention to this matter.

Yours truly,

Terence L. Mundorf
Terence L. Mundorf

Enclosure

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

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Avista Corporation;)	
Bonneville Power Administration;)	
Idaho Power;)	
The Montana Power Company;)	Docket No. RT01-35-000
Nevada Power Company;)	
PacifiCorp;)	
Portland General Electric Company;)	
Puget Sound Energy, Inc.; and)	
Sierra Pacific Power Company.)	

**MOTION TO INTERVENE OF THE
WESTERN PUBLIC AGENCIES GROUP**

Pursuant to 18 C.F.R. §385.214 and the Commission’s October 20th, 2000, Notice of Filing in this docket, the Western Public Agencies Group (“WPAG”)¹ hereby moves to intervene in the above captioned proceeding. The position of WPAG in this proceeding is set forth in the Protest of the Idaho Consumer Owned Utilities Association, Idaho Energy Authority, Northwest Requirements Utilities, Pacific Northwest Generating Company, Power Resource Managers LLP, Public Utility District No. 1 of Snohomish County, Washington, Utah Associated Municipal Power Systems, and Western Public Agencies Group, (hereinafter “Protest of Consumer-Owned Utilities”) which is being filed contemporaneously with this Motion To Intervene, and which Protest is hereby incorporated by reference.

¹The utilities included in WPAG are listed on Attachment 1 hereto.

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II.**COMMUNICATIONS**

All communications and correspondence relating to this proceeding should be addressed to the following individual, who should also be included on the service list for this proceeding:

Terence L. Mundorf
Marsh, Mundorf, Pratt, Sullivan & McKenzie
16000 Bothell-Everett Highway-Suite 160
Mill Creek, WA 98012-1514
Phone: (425) 337-2384
Facsimile: (425) 337-2386
E-mail: terrym@millcreeklaw.com

II.**INTEREST IN THIS PROCEEDING**

WPAG is an association of 23 not-for-profit consumer owned utilities that includes public utility districts, cooperatives, mutuals and municipalities located in the State of Washington. WPAG utilities serve approximately 700,000 retail customers. While some of the WPAG utilities own and operate electrical generating facilities, all of the WPAG utilities rely on the Bonneville Power Administration for some or all of the power used to serve their retail customers. All of the WPAG utilities are Transmission Dependent Utilities that rely on the transmission facilities of others, including some of the utilities that made the filing in this proceeding, to wheel power needed to fulfill their retail electric service obligations. As a consequence, WPAG utilities will be directly affected by the proposal of the filing utilities to create a separate entity into which they will place the transmission facilities they currently own and operate, and no other party will adequately represent the interests of the WPAG utilities.

The WPAG utilities are concerned that in a number of material respects the filing does not comport with the consensus agreements that were developed during the public collaboration process in which WPAG was an active participant. In addition, the filing does not comply with a number of important requirements of Order 2000, raising concerns that RTO West may not be able to provide cost-effective and reliable transmission service to Transmission Dependent Utilities in its service area, including the WPAG utilities. Perhaps most troubling, the filing is incomplete in a number of vital areas, making it impossible to offer meaningful comments, and raising questions regarding the nature and independence of RTO West. The disposition of these matters will directly impact the WPAG utilities, and gives them a strong interest in this proceeding.

III.

POSITION IN THIS PROCEEDING

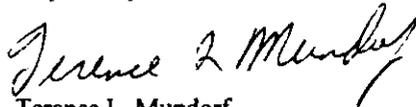
The position of WPAG in this proceeding is set forth in the Protest of Consumer-Owned Utilities, which is hereby incorporated by reference. In their Application, the all of the filing utilities have requested that the Commission rule that: (i) the governance structure of RTO West, including the Bylaws and Articles of Incorporation, satisfies the independence characteristic and the Commission's regional transmission organization policy; (ii) the proposed scope and configuration of RTO West meets the applicable requirements; and (iii) the proposed liability and insurance structure is satisfactory. In a separate request joined by only three of the nine filing utilities (Bonneville Power Administration, PacifiCorp and Idaho Power Company), the Commission is asked to declare that the concepts as a package contained in the Transmission Operating

Agreement and the Agreement to Suspend Provisions of Pre-Existing Transmission Agreements are appropriate and consistent with the requirements of Order 2000.

For the reasons set forth in detail in the Protest of the Consumer-Owned Utilities, it is the position of WPAG that: (i) the proposed governance structure does not comport with the regional consensus developed in the collaborative process and does not provide RTO West with the independence required by Order 2000, and therefore should not be approved; (ii) the geographic scope and configuration of RTO West are appropriate and should be approved. However, the control of RTO West over certain facilities, especially for maintenance coordination, reliability and expansion, is insufficient, making approval beyond geographic scope and configuration inappropriate at this time; (iii) no position is taken on the proposed liability and insurance provisions; (iv) with regard to approval of the certain agreements as concepts requested by three of the filing utilities, the contracts presented are incomplete in material respects, making action on them at this time premature. In the alternative, if these proposed agreements are considered sufficiently complete to warrant Commission action, the requested approval should be rejected.

Dated : November 18th, 2000.

Respectfully submitted,



Terence L. Mundorf
Marsh, Mundorf, Pratt, Sullivan & McKenzie
16000 Bothell-Everett Highway-Suite 160
Mill Creek, WA 98012-1514
(425) 337-2384

Attorneys for the Western
Public Agencies Group

ATTACHMENT 1

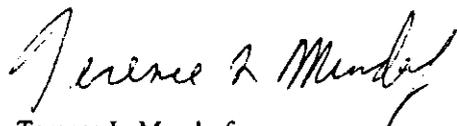
WPAG is comprised of the following utilities:

Alder Mutual Light Company
Benton County REA
City of Cheney
City of Ellensburg
City of Fircrest
City of Milton
City of Port Angeles
Elmhurst Mutual Power and Light Company
Lakeview Light & Power Company
Ohop Mutual Light Company
Parkland Light & Water Company
Peninsula Light Company
Public Utility District No. 1 of Clallam County, Washington
Public Utility District No. 1 of Clark County, Washington
Public Utility District No. 1 of Kittitas County, Washington
Public Utility District No. 1 of Lewis County, Washington
Public Utility District No. 1 of Mason County, Washington
Public Utility District No. 3 of Mason county, Washington
Public Utility District No. 2 of Pacific County, Washington
Public Utility District No. 1 of Snohomish County, Washington
Town of Eatonville
Town of Steilacoom

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **MOTION TO INTERVENE OF THE WESTERN PUBLIC AGENCIES GROUP** upon each person designated of the official service list compiled by the Secretary in this proceeding.

Dated this 18th day of November, 2000



Terence L. Mundorf
Marsh, Mundorf, Pratt, Sullivan & McKenzie
16000 bothell-Everett Highway-Suite 160
Mill Creek, WA 98012-1514
Phone: (425) 337-2384
Facsimile: (425) 337-2386

Attorneys for the Western Public Agencies Group