

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

Avista Corporation,)	Docket No. RT01 -35-007
Bonneville Power Administration,)	
Idaho Power Company,)	
The Montana Power Company,)	
Nevada Power Company,)	
Pacific Corp,)	
Portland General Electric Company,)	
Puget Sound Energy, Inc.,)	
Sierra Pacific Power Company)	

MOTION OF UBSAG TO INTERVENE

Pursuant to 18 C.F.R. § 385.214, and to the notice of filing dated April 30, 2002,

UBSAG (“UBS”) moves to intervene in this proceeding. In support thereof, the following is shown:

I. Communications

The persons designated for service are

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II. Ground for Intervention

UBS is a publicly held corporation organized under the laws of Switzerland, formed in 1998 by the merger of Union Bank of Switzerland and Swiss Bank Corporation. UBS has assets of approximately \$1.1 trillion, and provides banking and financial services worldwide. UBS and its subsidiaries have some 1,500 branches in 50 countries, and UBS operates in all of the world's leading financial centers. Shares of UBS common stock are traded on the SWX Swiss Exchange, the New York Stock Exchange, and the Tokyo Stock Exchange.

By order issued March 7, 2002, in Docket No. ER02-973-000, the Commission accepted for filing under Section 205 of the Federal Power Act a rate schedule authorizing UBS to make sales of electricity at wholesale at market-based rates and granted certain other authorizations and waivers routinely granted to power marketers.¹ UBS has recently begun power marketing activities.

By their filing of April 22, 2002, as well as a prior filing of March 29, 2002, the utilities listed in the caption above have submitted to the Commission a "Stage 2" filing describing their proposal for a regional transmission organization ("RTO"). The proposal covers matters such as the facilities to be transferred to the RTO, pricing, congestion management, ancillary services, market monitoring, facilities planning, and governance. The utilities seek, among other things, a declaration by the Commission that the proposal described in those filings conform to the requirements of Order No. 2000.

Because UBS expects to make purchases and sales, and otherwise to transact business, within the affected region and under the rules of the proposed RTO, UBS may be affected by the outcome of this proceeding. UBS accordingly seeks leave to intervene. In

¹ UBSAG, 98 FERC ¶ 61,255 (2002).

addition to its intent to intervene separately, UBS participates in the Northwest IPPs/Marketers (“IPPs/Marketers”), which is already an intervenor in this docket.² The IPPs/Marketers have filed comments on applicants’ Stage 2 filing,³ and UBS fully supports those comments. To realize the full benefits of an RTO in the Pacific Northwest and to promote competitive and efficient power markets in the Western U.S., UBS urges the Commission to consider carefully the comments of IPP/Marketers and adopt the recommendations set forth therein.

CONCLUSION

The motion of UBS to intervene should be granted.

Respectfully submitted,

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May 29, 2002

² Avista Corp., et al., 95 FERC 61,114 at 61,323 (April 26, 2001).

³ Intervention And Protest Of Northwest IPPs/Marketers Group, May 28, 2002.

CERTIFICATE OF SERVICE

I hereby certify that I have this 29th day of May 2002, served by first class mail, postage prepaid, a copy of the foregoing upon all parties listed on the service list compiled in this proceeding.

Nicholas W. Fels