

ORIGINAL

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

FILED  
02 MAY 29 PM 4:41  
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 Nos. RT01-35-005 and  
RT01-35-007

**MOTION TO INTERVENE OF THE NORTHERN  
CALIFORNIA POWER AGENCY**

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure and the Commission's April 17, 2002 Notice of Extension of Time, the Northern California Power Agency ("NCPA") hereby moves to intervene in the above-captioned docket. In support of this pleading, NCPA offers the following.

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I.

Communications regarding this Motion should be addressed to:

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II.

NCPA

NCPA is a public agency engaged in the generation and transmission of electric power and energy. NCPA was created by a joint powers agreement dated July 19, 1968, as amended, entered pursuant to Chapter 5, Division 7, Title 1 of the California Government Code commencing with Section 6500. The Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Port of Oakland, Redding, Roseville, Santa Clara and Ukiah, and the Turlock Irrigation District and the Truckee Donner Public Utility District are members of NCPA. The Association of Bay Area Governments, Bay Area Rapid Transit, Lassen Municipal Utility District, Placer County Water Agency, Plumas-Sierra Rural Electric Cooperative and the Cities of Davis and Santa Barbara are associate members of NCPA.

NCPA<sup>3</sup> owns a limited amount of 230 kV and 115 kV transmission in its own name, and has constructed a considerable amount of 69 kV and 115 kV transmission

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<sup>3</sup> The figures given here apply to NCPA's ten interconnected members (signatories to the IA).

through its members. It is also (through its members) a partial owner of the 500 kV California-Oregon Transmission Project (“COTP”), which adds approximately 1,600 MW of inertia capacity between the CAISO and the Pacific NW. In addition, NCPA has a contractual share of the so-called South of Tesla Project (“SOTP”) in which transmission capability from Midway to and from the termination of the COTP at Tesla is provided over PG&E transmission capacity. Finally, NCPA members’ allocations of approximately 320 MW of power from the Western Area Power Administration (“Western”) are delivered pursuant to contracts 2948A and 2947A.<sup>4</sup>

NCPA seeks intervention on behalf of itself and its members, including those members that are signatories to the NCPA/PG&E Interconnection Agreement. The Interconnection Agreement (“IA”) among NCPA, its member Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Roseville and Ukiah, and the Plumas-Sierra Rural Electric Cooperative, and PG&E was accepted by this Commission by order of September 14, 1983, in Docket No. ER83-683-000. It was amended by a settlement agreement accepted by the Commission by order of May 12, 1992, in Docket Nos. EL89-34, ER90-355, *et al.* The IA is currently on file as PG&E FERC Rate Schedule No. 142.<sup>5</sup>

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<sup>4</sup> This amounts to approximately 28% of Western’s 1152 MW load.

<sup>5</sup> While PG&E has moved to terminate the existing IA and substitute a replacement, the Commission has suspended PG&E’s actions for five months up to September 1, 2002, and ordered PG&E to continue to provide the same services provided previously.

### **III. BASIS FOR INTERVENTION**

NCPA and its member communities and public agencies are located in various locations throughout Northern California. They are load serving entities who participate in the California markets both as buyers and as sellers, and NCPA and its members also participate in the markets in the Western States (including long-term historical arrangements with entities in the Pacific Northwest to take advantage of seasonal diversity). While the current proposal does not anticipate that RTO West would include California, the plans for RTO formation throughout the United States remain in flux. In any event, California market participants such as NCPA will at the very least interface with RTO West, and may ultimately participate in the same RTO. NCPA therefore has an interest in the formation of RTO West. NCPA has an interest not represented by any other party to this proceeding, and its participation is in the public interest.

### **IV. NCPA'S POSITION**

As noted above, NCPA is a market participant both in the California marketplace and in the broader markets in the Western states. As a load serving entity with generation resources and load spread throughout Northern California, NCPA matches resources to load in real time. Historically, NCPA has been able to follow load and serve its communities through Existing Transmission Contract rights, and to do so in a way that optimizes both the financial and operational benefits for its members. NCPA's ability to follow load in this manner is a crucial component of its ability to serve its member communities and public agencies and their end-use consumers. NCPA seeks to participate in this docket primarily to ensure that its ability to serve its member

communities this way is preserved in future RTO plans, whether as an interface issue with California, or as a part of a broader Western RTO. At present, NCPA notes only that the RTO West proposal still lacks many details that would allow a reasoned evaluation of its component. NCPA anticipates that its position on specific issues will develop over time.

### CONCLUSION

Wherefore, for the reasons set forth above, NCPA requests that the Commission grant NCPA's motion to intervene in this docket, and all other relief that may be just and proper.

Respectfully submitted,



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May 29, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have on this 29th day of May, 2002, caused the foregoing document to be sent by first-class mail to all parties on the list compiled by the Secretary of the Commission in this proceeding.



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