

UNITED STATES DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

<i>In the Matter of:</i>	)		
	)		
Average System Cost Review of:	)		
	)		
PacifiCorp,	)	BPA Docket Nos.	ASC-09-PA-01
Portland General Electric Company	)		ASC-09-PG-01
Franklin County PUD,	)		ASC-09-FR-01
Idaho Power Company,	)		ASC-09-IP-01
NorthWestern Energy,	)		ASC-09-NW-01
Puget Sound Energy, Inc.	)		ASC-09-PS-01
	)		
	)		
	)	PETITION TO INTERVENE OF	
	)	AVISTA CORPORATION	

---

On October 3, 2008, Bonneville Power Administration (“Bonneville”) posted notice of FY 2009 Average System Cost (“ASC”) Initial Utility filings on Bonneville’s electronic website. Bonneville’s notice provided that petitions to intervene in the FY 2009 ASC Review Process are due by October 7, 2008. Pursuant to Section III of Bonneville’s 2008 Average System Cost Methodology, any Regional Power Sales Customer or state utility Regulatory Body who so requests will be accorded party status for Bonneville’s ASC review process if said request is received by the established deadline. The filing Utility is automatically a party to its own ASC review proceeding. Accordingly, Avista Corporation (“Avista”) hereby files this Petition to Intervene as a party in each of these proceedings.

**I. PETITION TO INTERVENE**

Avista is a corporation created and organized under the laws of the State of Washington with its principal office in Spokane, Washington. Avista is an investor-

owned utility engaged in among other things, the business of generating, transmitting, and distributing electric power to wholesale and retail customers in Idaho and Washington.

Bonneville's 2008 Average System Cost Methodology defines a "Regional Power Sales Customer" as "any entity that can contract directly with BPA for the purchase of power under sections 5(b), 5(c), or 5(d) of the Northwest Power Act for delivery in the region as defined by section 3(14) of the Northwest Power Act."<sup>1</sup> Avista is an entity that can contract directly with Bonneville for the purchase of power under §§ 5(b) or 5(c) of the Northwest Power Act for delivery in the region as defined by § 3(14) of the Northwest Power Act and, therefore is a Regional Power Sales Customer eligible for party status in the above-captioned proceedings.

Avista has an interest in these proceedings, and Avista's interests cannot be adequately represented by any other party. Accordingly, Avista respectfully requests that it be allowed to intervene as a party in the above-captioned proceedings.

## **II. COMMUNICATIONS**

All materials and communications relating to these proceedings should be served on the following:

Larry La Bolle  
Director, Federal and Regional Affairs  
Avista Corporation  
1411 E. Mission Ave., MSC-7  
Spokane, WA 99202  
Telephone: (509) 495-4710  
Facsimile: (509) 777-5495  
E-mail: larry.labolle@avistacorp.com

Michael G. Andrea  
Staff Attorney  
Avista Corporation  
1411 E. Mission Ave., MSC-23  
Spokane, WA 99202  
Telephone: (509) 495-2564  
Facsimile: (509) 777-5468  
E-mail: michael.andrea@avistacorp.com

---

<sup>1</sup> 2008 ASC Methodology, Section I.Q.

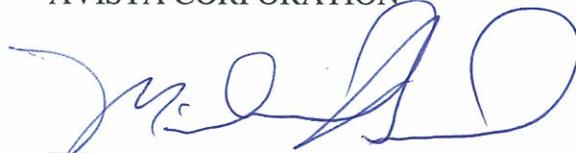
**III. CONCLUSION**

WHEREFORE, for the foregoing reasons, Avista respectfully requests that it be allowed to intervene in the above-captioned proceedings as a party.

DATED this 7th day of October 2008.

Respectfully Submitted,

AVISTA CORPORATION



---

Michael G. Andrea, WSBA No. 38684  
Staff Attorney  
Attorney for Avista Corporation

## CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition to Intervene of Avista Corporation upon the parties listed below via e-mail:

Michelle Manary, Supervisory Public Utilities  
Specialist – 2008 ASC Methodology  
Email: [BPAAverageSystemCost@bpa.gov](mailto:BPAAverageSystemCost@bpa.gov)

BPA's Office of General Counsel  
Kurt Casad, Office of the General Counsel, BPA  
Email: [krcasad@bpa.gov](mailto:krcasad@bpa.gov)

DATED this 7th day of October 2008.



---

Michael G. Andrea