



STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL
LAWRENCE G. WARDEN

VIA ELECTRONIC MAIL
BPAAverageSystemCost@bpa.gov

October 7, 2008

Michelle L. Manary
REP Manager
Bonneville Power Administration, F-2
PO Box 3621
Portland, OR 97208-3621

Re: Petition to Intervene
FY 2009 ASC Review Proceeding
Docket Nos. ASC-09-AV-01, ASC-09-IP-01, ASC-09-PA-01

Please find enclosed a Petition to Intervene filed by the Idaho Public Utilities Commission (Idaho PUC) in the three FY 2009 ASC dockets set out above. Please contact me at (208) 334-0312 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald L. Howell, II".

Donald L. Howell, II
Deputy Attorney General

Enclosures

cc: LouAnn Westerfield
Neil Price

bls/N:BPA_ASC09-AV01_IP01_PA01_letter_dh

**UNITED STATES OF AMERICA
U.S. DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION**

IN RE)	
FY 2009 AVERAGE SYSTEM COST REVIEW)	DOCKET NOS. ASC-09-AV-01
PROCESS FOR AVISTA, IDAHO POWER)	ASC-09-IP-01
COMPANY, AND PACIFICORP)	ASC-09-PA-01
)	

**PETITION TO INTERVENE BY THE
IDAHO PUBLIC UTILITIES COMMISSION**

Pursuant to the notification of Bonneville Power Administration (“Bonneville” or “BPA”), the Idaho Public Utilities Commission (“Idaho PUC”) respectfully moves to intervene in the three above-entitled proceedings. Bonneville’s Public Notice of the FY 2009 Average System Cost (ASC) review process requires Petitions to Intervene to be filed no later than the close of business on October 7, 2008.

I. INTEREST OF PETITIONER

The Idaho PUC is the state regulatory commission empowered pursuant to Idaho Code Title 61 to regulate all investor-owned utilities (IOUs) operating within the State of Idaho. In this capacity, the Idaho PUC is responsible for regulating the retail electric rates of Avista Utilities, Idaho Power Company, and PacifiCorp dba Rocky Mountain Power. *Idaho Code* § 61-502. Until the residential exchange program (REP) was suspended last summer, these Idaho IOUs participated in the REP. 16 U.S.C. § 839c(c). Each utility’s ASC is part of the REP calculation. 16 U.S.C. § 839c(c)(7).

Over the years, residential and small-farm irrigation customers of the three Idaho IOUs have shared in the benefit of the region’s federal hydroelectric projects. The suspension of the REP credits in June 2007 resulted in a net rate increase for more than 560,000 Idaho

customers. The Idaho PUC has previously participated in the 2008 ASC Methodology docket (No. ASCM-08). As the state regulatory body, the Idaho PUC has a vested interest that the IOUs correctly calculate their respective ASCs.

Consequently, the Idaho PUC has a direct and substantial interest in the calculation of the FY ASC of the three IOUs that it regulates.

II. COMMUNICATIONS AND SERVICE

The Idaho PUC requests that all communications and papers relating to this proceeding be served upon:

Donald L. Howell, II
Deputy Attorney General
Idaho Public Utilities Commission
PO Box 83720
472 W. Washington Street (83702-5918)
Boise, ID 83720-0074
Idaho State Bar No. 3366
Telephone No. (208) 334-0312
E-mail: don.howell@puc.idaho.gov

Lou Ann Westerfield
Policy Strategist
Idaho Public Utilities Commission
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472 W. Washington Street (83702-5918)
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The Idaho PUC requests that these names be added to the official service list for the above-captioned docket.

III. CONCLUSION

The Idaho PUC intends to participate in these three dockets and has a definable interest in the outcome of these proceedings. Granting the Idaho PUC intervention in the three ASC dockets will promote the public interest. Consequently, the Idaho PUC respectfully requests that its Petition to Intervene as a party in these three dockets be granted.

Respectfully submitted this 7th day of October 2008.

FOR THE IDAHO PUBLIC UTILITIES COMMISSION



Donald L. Howell, II
Deputy Attorney General

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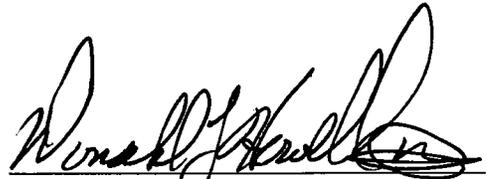
CERTIFICATE OF SERVICE

I hereby certify that a copy of the Idaho Public Utilities Commission's Petition to Intervene in BPA Docket Nos. ASC-09-AV-01, ASC-09-IP-01, ASC-09-PA-01 was emailed to the following on October 7, 2008.

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