

UNITED STATES DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

<i>In the Matter of:</i>	)	
	)	
Average System Cost Review of:	)	BPA Docket Nos:
	)	
Avista Corporation,	)	ASC-09-AV-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	)	ASC-09-PS-01
	)	
	)	PETITION TO INTERVENE OF IDAHO
	)	POWER COMPANY

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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, Idaho Power Company (“Idaho Power”) hereby files this Petition to Intervene as a party in each of the above captioned proceedings.

## I. PETITION TO INTERVENE

Idaho Power Company is a corporation organized under the laws of the State of Idaho, with its principal offices located in Boise, Idaho. Idaho Power is an investor-owned utility engaged in, among other things, generating, transmitting, and retail sales of electricity to residential and small farm customers in the States of Idaho and Oregon.

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> Idaho Power 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.

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

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

## II. NOTICE AND COMMUNICATIONS

All correspondence, communications, pleadings and other documents related to this proceeding should be addressed to the following individuals:

Patricia Nichols	<u>Street Address</u>
Pricing & Regulatory Services Dept.	1221 W. Idaho Street
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## III. CONCLUSION

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

DATED this 7<sup>th</sup> day of October 2008.

Respectfully Submitted,

PAINE HAMBLEN LLP

By: /s/ R. Blair Strong  
R. Blair Strong  
Attorneys for Idaho Power Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have on this day served a copy of the foregoing Petition to Intervene of PacifiCorp 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 7<sup>th</sup> day of October, 2008.

By: /s/ R. Blair Strong \_\_\_\_\_  
R. Blair Strong  
Attorney for Idaho Power Company