UNITED STATES DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

In the Matter of:	)		
	)		
Average System Cost Review of:	)		
	)		
Avista Corporation,	)	BPA Docket Nos.	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 PACIFICORP	
	)		
	)		

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, PacifiCorp ("PacifiCorp") hereby files this Petition to Intervene as a party in each of these proceedings.

I. PETITION TO INTERVENE

PacifiCorp is an investor-owned utility with its principal place of business in Portland, Oregon. PacifiCorp is primarily engaged in the business of providing electric service to retail customers in six western states: Oregon, Washington, California, Wyoming, Utah, and Idaho.

As a load-serving entity, PacifiCorp is responsible for providing reliable and efficient electric service to more than 1.7 million consumers.

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."[1] PacifiCorp 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.

PacifiCorp has an interest in these proceedings, and PacifiCorp's interests cannot be adequately represented by any other party. Accordingly, PacifiCorp 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:

Natalie L. Hocken
Vice President & General Counsel, Pacific Power
PacifiCorp
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[1] 2008 ASC Methodology, Section I.Q.

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With a courtesy copy requested to be sent to:

Phil Obenchain
Director, Bonneville Regional Affairs
PacifiCorp
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E-mail: Phil Obenchain@pacificorp.com

III. CONCLUSION

WHEREFORE, for the foregoing reasons, PacifiCorp 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,

By: _____
Natalie L. Hocken
Attorney for PacifiCorp

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

BPA's Office of General Counsel Kurt Casad, Office of the General Counsel, BPA Email: krcasad@bpa.gov

DATED this 7th day of October, 2008.

By: _____
Natalie L. Hocken
Attorney for PacifiCorp