

UNITED STATES
DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

In the Matter of:

Average System Cost Review of:

Avista Corporation (ASC-09-AV-01)
PacifiCorp (ASC-09-PA-01)
Idaho Power Company (ASC-09-IP-01)
NorthWestern Energy (ASC-09-NW-01)
Puget Sound Energy, Inc. (ASC-09-PS-01)
Franklin Public Utility District (ASC-09-FR-01)

BPA Dockets Nos. ASC-09-AV-01
ASC-09-PA-01
ASC-09-IP-01
ASC-09-NW-01
ASC-09-PS-01
ASC-09-FR-01

PETITION TO INTERVENE OF
PORTLAND GENERAL ELECTRIC
COMPANY

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, Portland General Electric Company (“PGE”) hereby files this Petition to Intervene as a party in each of the above-captioned proceedings.

I. PETITION TO INTERVENE

PGE is a corporation created and organized under the laws of the State of Oregon with its principal office in Portland, Oregon. PGE is an investor-owned utility engaged in, among other things, the business of generating, transmitting and distributing electric power to customers in 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.”¹ PGE is an entity that can contract directly with Bonneville for the purchase of power under sections 5(b) or 5(c) of the Northwest Power Act for delivery in the region as defined by section 3(14) of the Northwest Power Act and, therefore is a Regional Power Sales Customer eligible for party status in the above-captioned proceedings.

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

Stefan Brown
Portland General Electric Company
121 SW Salmon Street 1WTC0301
Portland, OR 97204
Telephone (503) 464-8937
Fax (503) 464-2354
Email Stefan.Brown@pgn.com

David F. White
Tonkon Torp LLP
1600 Pioneer Tower
888 S.W. Fifth Avenue
Portland, OR 97204
Telephone (503) 802-2168
Fax (503) 972-3868
Email david.white@tonkon.com

With a courtesy copy to:

Cheryl A. Chevis
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street 1WTC1301
Portland, OR 97204
Telephone (503) 464-7193
Fax (503) 464-2200
Email cheryl.chevis@pgn.com

¹ 2008 ASC Methodology, Section I.Q.

III. COMMUNICATIONS

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

DATED this 7th day of October, 2008.

Portland General Electric Company



David F. White, OSB No. 01138

Of Attorney for Portland General Electric Company

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CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition to Intervene of PGE upon the parties listed below via email and by regular mail, properly addressed and with postage prepaid to:

Michelle Manary, Supervisory Public Utilities
Specialist – 2008 ASC Methodology
Bonneville Power Administration
905 NE 11th Avenue
Portland, OR 97232
Email: BPAAverageSystemCost@bpa.gov

BPA's Office of General Counsel
Kurt R. Casad
Office of the General Counsel,
Bonneville Power Administration
US Dept of Energy BPA LP-7
P. O. Box 3621
Portland, OR 97208
Email: krcasad@bpa.gov

DATED this 7th day of October, 2008.



David F. White, OSB No. 01138
Of Attorney for Portland General Electric Company

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