

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

**In the Matter of the Average System Cost Review of
Avista Corporation**

Docket No. ASC-09-AV-01

**In the Matter of the Average System Cost Review of
PacifiCorp**

Docket No. ASC-09-PA-01

**In the Matter of the Average System Cost Review of
Portland General Electric Company**

Docket No. ASC-09-PG-01

**In the Matter of the Average System Cost Review of
NorthWestern Energy**

Docket No. ASC-09-NW-01

**In the Matter of the Average System Cost Review of Idaho
Power Company**

Docket No. ASC-09-IP-01

**In the Matter of the Average System Cost Review of
Public Utility District No. 1 of Franklin County,
Washington**

Docket No. ASC-09-FR-01

PETITION TO INTERVENE OF PUGET SOUND ENERGY, INC.

On October 3, 2008, Bonneville Power Administration (“BPA”) posted notice of FY 2009 Average System Cost (“ASC”) Initial Utility filings on BPA’s website. BPA’s notice provided that petitions to intervene in the FY 2009 ASC Review Process are due by October 7, 2008. Pursuant to Section III.D of BPA’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, Puget Sound Energy, Inc. (“PSE”) hereby files this Petition to Intervene as a party in each of Docket No. ASC-09-AV-01 (Avista Corporation), Docket

No. ASC-09-PA-01 (PacifiCorp), Docket No. ASC-09-PG-01 (Portland General Electric Company), Docket No. ASC-09-NW-01 (NorthWestern Energy), Docket No. ASC-09-IP-01 (Idaho Power Company), and Docket No. ASC-09-FR-01 (Public Utility District No. 1 of Franklin County, Washington).

I. PETITION TO INTERVENE

PSE is an investor-owned utility with its principal place of business in Bellevue, Washington. The name and address of PSE are as follows:

Puget Sound Energy, Inc.
10885 NE 4th Street
P.O. Box 97034
Bellevue, Washington 98009-9734

BPA'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." PSE is an entity that can contract directly with BPA 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.

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

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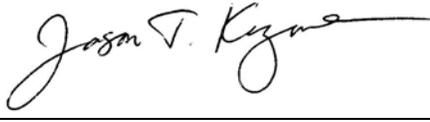
III. CONCLUSION

For the reasons stated above, PSE respectfully requests that it be allowed to intervene in each of each of Docket No. ASC-09-AV-01 (Avista Corporation), Docket No. ASC-09-PA-01 (PacifiCorp), Docket No. ASC-09-PG-01 (Portland General Electric Company), Docket No. ASC-09-NW-01 (NorthWestern Energy), Docket No. ASC-09-IP-01 (Idaho Power Company), and Docket No. ASC-09-FR-01 (Public Utility District No. 1 of Franklin County, Washington).

DATED this 7th day of October 2008.

Respectfully submitted

PERKINS COIE LLP

By 

Donald G. Kari, WSBA No. 4717
Jason Kuzma, WSBA No. 31830
Attorneys for Puget Sound Energy, Inc.

CERTIFICATE OF SERVICE

I certify that I am over 18 years of age and not a party to this matter. I certify that I have on this day served a copy of the foregoing Petition to Intervene of Puget Sound Energy, Inc. upon the parties listed below via e-mail and U.S. Mail:

Michelle Manary
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Email: BPAAverageSystemCost@bpa.gov

Kurt Casad
Office of the General Counsel
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621
Email: krcasad@bpa.gov

Dated this 7th day of October, 2008.



Jason Kuzma, WSBA No. 31830