

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

**IN THE MATTER OF:** ) **BPA FILE No.: BP-14**  
 )  
**BPA FY2014 RATE CASE** )  
 )  
 ) **PETITION FOR**  
 ) **INTERVENTION OF**  
 ) **SIMPSON TACOMA KRAFT**  
 ) **COMPANY, LLC**  
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Pursuant to the notice appearing in the Federal Register on November 8, 2012, 77 Fed. Reg. 66,966, Simpson Tacoma Kraft Company, LLC (“Simpson”) respectfully petitions for intervention as a party in this proceeding. Simpson’s primary concerns relate to the Dispatchable Energy Resource Balancing Service (“DERBS”) being proposed by Bonneville Power Administration (“BPA”). In support of this request, Simpson states as follows:

**I. PETITION TO INTERVENE**

Simpson is an LLC organized under the laws of the State of Washington, with an office in Tacoma, Washington. Simpson owns and operates a 60 MW nameplate rated biomass power facility in Tacoma, Washington, within BPA’s balancing authority. The cogeneration facility is located at a pulp and paper manufacturing complex. This proceeding concerns proposed changes to BPA’s transmission and ancillary services, of which Simpson is a customer. In particular, the DERBS 2 MW dead band has a negative financial impact on Simpson because it does not accommodate the cogeneration characteristics of the plant and the renewable character of its fuel supply. The renewable biomass fuel used to power the plant is a highly variable resource that causes

uncontrollable, short-term changes in steam production. These short-term steam changes are the reason that electrical generation swings outside the 2 MW dead band.

As Simpson is directly and significantly impacted by this proceeding, and its interests cannot be adequately represented by another party, it respectfully requests that it be allowed to intervene as a party.

## **II. COMMUNICATIONS**

Copies of all pleadings, notices and other documentation should be served on the following authorized representatives of Simpson:

Dave McEntee  
Vice President, Operations Services  
Simpson Tacoma Kraft Co., LLC  
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### III. CONCLUSION

For the reasons stated herein, Simpson respectfully requests that it be allowed to intervene in BPA File No. BP-14 as a party.

DATED this 14th day of November, 2012.

Respectfully submitted,

**/s/ Kari Vander Stoep**

Kari Vander Stoep  
K&L Gates LLP  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104

Attorney for Simpson

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a copy of the foregoing PETITION FOR INTERVENTION OF SIMPSON TACOMA KRAFT COMPANY, LLC upon the individuals listed below via electronic mail:

Hearing Clerk – L-7  
Bonneville Power Administration  
905 NE 11th Avenue  
Portland, OR 97232  
Email: [rateclerk@bpa.gov](mailto:rateclerk@bpa.gov)

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DATED this 14th day of November, 2012.

Respectfully submitted,

**/s/ Kari Vander Stoep**  
Kari Vander Stoep  
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925 Fourth Avenue, Suite 2900  
Seattle, WA 98104

Attorney for Simpson