

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**
) **WILLOW CREEK ENERGY**
) **LLC AND GRAYS HARBOR**
) **ENERGY LLC**
)

Pursuant to the notice appearing in the Federal Register on November 8, 2012, 77 Fed. Reg. 66,966, Willow Creek Energy LLC (“Willow Creek”) and Grays Harbor Energy LLC (“Grays Harbor”) respectfully petition for intervention as parties in this proceeding. Willow Creek’s and Grays Harbor’s primary concerns relate to the Dispatchable Energy Resource Balancing Service (“DERBS”) and Variable Energy Resource Balancing Service (“VERBS”) being proposed by Bonneville Power Administration (“BPA”). In support of this request, Willow Creek and Grays Harbor state as follows:

I. PETITION TO INTERVENE

Willow Creek is a Delaware limited liability company that owns and operates a 72 MW wind-powered electric generation facility in Gilliam and Morrow counties, Oregon, within BPA’s balancing authority. Grays Harbor is a Delaware limited liability company that owns and operates a 650 MW nameplate gas-fired electric generation facility in Grays Harbor County, Washington, within BPA’s balancing authority. Willow Creek and Grays Harbor are affiliates of Invenergy LLC. This proceeding concerns proposed changes to BPA’s wholesale power rates, control area service rates,

transmission and ancillary services, of which Willow Creek and Grays Harbor are customers. As Willow Creek and Grays Harbor are directly and significantly impacted by this proceeding, and their interests cannot be adequately represented by another party, they respectfully request that they be allowed to intervene as parties.

II. COMMUNICATIONS

Copies of all pleadings, notices and other documentation should be served on the following authorized representatives of Willow Creek and Grays Harbor:

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III. CONCLUSION

For the reasons stated herein, Willow Creek and Grays Harbor respectfully request that they be allowed to intervene in BPA File No. BP-14 as parties.

DATED this 15th day of November, 2012.

Respectfully submitted,

/s/ Andrew Young

Andrew Young

K&L Gates LLP

1601 K Street, NW

Washington, DC 20006-1600

Attorney for

Willow Creek and Grays Harbor

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing PETITION FOR INTERVENTION OF WILLOW CREEK ENERGY LLC AND GRAYS HARBOR ENERGY LLC upon the individuals listed below via electronic mail:

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DATED this 15th day of November, 2012.

Respectfully submitted,

/s/ Andrew Young
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Attorney for
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