

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

IN THE MATTERS OF:)
)
BPA FY2016 RATE CASE, AND) **BPA FILE NO. BP-16**
)
OVERSUPPLY RATE PROPOSED AS) **INTERVENTION PETITION OF**
PART OF FERC COMPLIANCE FILING) **CAITHNESS SHEPHERDS FLAT,**
) **LLC**
)
_____)

Pursuant to the notice appearing in the Federal Register on December 4, 2014, 79 Fed. Reg. 71985, Caithness Shepherds Flat, LLC (“Caithness”) respectively petitions for intervention as a party in these proceedings. In support, Caithness states as follows:

I. PETITION TO INTERVENE

Caithness represents the interests of its three wholly owned subsidiaries, each one the direct owner and operator of a wind-energy facility dependent on Bonneville Power Administration (“BPA”) for firm PTP transmission service and associated ancillary services. Caithness’ interest in BP-16 relates to the level and design of BPA’s rates for transmission services and ancillary services. Caithness has a material interest in this proceeding. Among other concerns, Caithness has an interest in ensuring that BPA’s costs of service are allocated among customer classes in accordance with all statutes applicable to BPA. Caithness’ interest cannot adequately be represented by any other party.

II. COMMUNICATIONS

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

Jeffrey J. Delgado, Vice President
Caithness Shepherds Flat, LLC
565 5th Avenue, 29th Floor
New York, NY 10017
Phone: 917-472-4572
Fax: 212-921-9239
E-Mail: jdelgado@caithnessenergy.com

John Cameron
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
Phone: 503-778-5206
Fax: 503-778-5399
E-Mail: johncameron@dwt.com

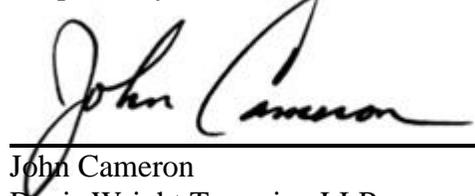
Derek Green
Davis Wright Tremaine LLP
1300 SW Fifth Avenue
Portland, OR 97201
Phone: 503-778-5264
Fax: 503-778-5399
E-Mail: derekgreen@dwt.com

III. CONCLUSION

For the reasons stated herein, Caithness respectfully requests that it be allowed to intervene in BPA File No. BP-16 as a party.

DATED this 10th day of December, 2014.

Respectfully submitted,



John Cameron
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201

Of Attorneys for Caithness
Shepherds Flat, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing **PETITION FOR INTERVENTION OF CAITHNESS SHEPHERDS FLAT, 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

Kurt Casad, LP-7
Barry Bennett, LC-7
Office of General Counsel
Bonneville Power Administration
905 N.E. 11th Ave.
Portland, OR 97232
Email: krcasad@bpa.gov
Email: bbennett@bpa.gov

DATED this 10th day of December, 2014.



John Cameron
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201

Of Attorneys for Caithness
Shepherds Flat, LLC