

UNITED STATES DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

*In the Matter of:* )  
 ) BPA Docket No. BP-16  
The Bonneville Power Administration )  
 ) PETITION TO INTERVENE OF  
 ) THE M-S-R PUBLIC POWER AGENCY  
2016 Proposed Rate Adjustment Proceeding )

Pursuant to Rule 101.4(b) of the Bonneville Power Administration (“BPA”) Rules of Procedure Governing Rate Hearings, and the notice posted in the Federal Register on December 4, 2014, regarding BPA’s proposed Rate Adjustment Proceeding, Public Hearing and Opportunities for Public Review and Comment, 79 Fed. Reg. 71984 (2014), the M-S-R Public Power Agency (“M-S-R”) hereby files this Petition to Intervene as a party in this proceeding.

**I. PETITION TO INTERVENE**

M-S-R is a joint powers agency formed by the Modesto Irrigation District, and the Cities of Santa Clara and Redding, California, each of which is a consumer owned utility. Beginning with a 2005 contract, M-S-R obtained contractual rights to the output from some of the first large scale wind resources developed in Washington State. M-S-R’s contracts include provision requiring M-S-R to pay certain BPA transmission charges. M-S-R and its members currently have rights to 350 MW of wind generation in Washington and Oregon, which its members use to serve their customers and meet California’s Renewable Portfolio Standards (“RPS”). Those customers ultimately bear the cost of the BPA transmission rates.

The BP-16 rate proceeding will establish, among other things, the point-to-point transmission rates, Variable Energy Resource Balancing Service (“VERBS”) changes and imbalance changes that affect the rates paid and services received by M-S-R during the FY2016-

2017 rate period. Accordingly, M-S-R has a substantial interest in this proceeding because it will be directly and substantially affected by any determination regarding the proposed power and transmission rate adjustments. No other party can adequately represent M-S-R's interests in this proceeding. M-S-R, therefore, has good cause to intervene in the BP-16 proceeding, and such intervention is in the public interest.

## II. COMMUNICATIONS

M-S-R requests that the following names be added to the official service list for this proceeding and that pleadings, communications, correspondence, and documents concerning the BP-16 proceeding be directed to

Peter J. Scanlon  
Duncan, Weinberg, Genzer  
& Pembroke, P.C.  
1615 M Street, NW, Suite 800  
Washington, DC 20036  
(202) 467-6370  
pjs@dwgp.com

David Arthur  
KBT, Inc.  
8227 East Echo Canyon St.  
Mesa, AZ 85207  
(916) 709-0079  
davidarthurconsulting@yahoo.com

## III. CONCLUSION

M-S-R respectfully requests that this Petition to Intervene in the BP-16 proceeding be granted and that it be made a party to this proceeding and that its designated representatives be added to the service list.

DATED: December 9, 2014

Respectfully submitted,

/s/ Peter J. Scanlon  
Peter J. Scanlon  
Duncan, Weinberg, Genzer  
& Pembroke, P.C.  
1615 M Street, NW, Suite 800  
Washington, DC 20036  
(202) 467-6370  
pjs@dwgp.com

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2014, I served via first class mail and electronic mail, M-S-R’s Petition to Intervene in the BP-16 proceeding upon:

Hearing Clerk – L-7 Bonneville Power Administration 905 NE 11 <sup>th</sup> Ave. Portland, OR 97232	E-mail: rateclerk@bpa.gov
Mr. Kurt Casad LP-7 Bonneville Power Administration Office of General Counsel 905 NE 11 <sup>th</sup> Ave. Portland, OR 97232	E-mail: krcasad@bpa.gov
Mr. Barry Bennett LT-7 Bonneville Power Administration Office of General Counsel 905 NE 11 <sup>th</sup> Ave. Portland, OR 97232	E-mail: bbennet@bpa.gov

DATED: December 9, 2014

Respectfully submitted,

/s/ Peter J. Scanlon

Peter J. Scanlon  
Duncan, Weinberg, Genzer  
& Pembroke, P.C.  
1615 M Street, NW, Suite 800  
Washington, DC 20036  
(202) 467-6370  
pjs@dwgp.com