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2
3 UNITED STATES OF AMERICA
4 U.S. DEPARTMENT OF ENERGY
5 BEFORE THE
6 BONNEVILLE POWER ADMINISTRATION

7 2016 BPA RATE CASE)

8) BPA Docket No. BP-16
9)
10)

11 PETITION TO INTERVENE BY
12 CITY OF TACOMA TO BE A FORMAL PARTY

13 TO: Hearing Clerk –L-7
14 Bonneville Power Administration
15 905 N.E. 11th Avenue
16 Portland, OR 97232
17 rateclerk@bpa.gov

18 The City of Tacoma, Department of Public Utilities, Light Division (Washington),
19 dba Tacoma Power (“TPWR”), by and through its undersigned legal counsel and Chief
20 Executive Officer, hereby petitions to intervene as a formal party in the Bonneville
21 Power Administration Fiscal Year (FY) 2016-2017 Rate Adjustment proceeding (BP-16).

22 PETITIONER’S NAME AND STREET ADDRESS

23 City of Tacoma
24 Department of Public Utilities
25 Light Division
26 3628 South 35th Street
Tacoma, WA 98409

PETITION TO INTERVENE - 1
BP-16

BP-16-S-TA-01

Office of the City Attorney
Department of Public Utilities
3628 South 35th Street
P. O. Box 11007
Tacoma, Washington 98411
Phone 253.502.8348
Facsimile 253.502.8672

1 INTEREST

2 Tacoma Power is a customer of BPA pursuant to Power Sales Agreement 09PB-
3 13111, and Service Agreement for Point to Point Transmission 98TX-10103, therefore
4 has a direct interest in the outcome of said rate proceeding, and terms and conditions
5 proceeding.

6 Tacoma Power is a publicly owned electric utility that serves retail electric loads
7 in Tacoma, Washington. Tacoma Power also owns generating resources and uses
8 BPA's transmission system for deliveries of power. It is a partial requirement
9 preference customer of BPA under the current power contract with BPA.
10

11 As a publicly owned utility in the Northwest, Tacoma Power has preference rights
12 under federal acts. Under the Pacific Northwest Power Planning and Conservation Act,
13 it may request power or other services from BPA at any time and has the right to
14 purchase power and transmission under one or more of the proposed rate schedules in
15 this proceeding.

16 Tacoma Power has a direct and substantial interest in this proceeding since the
17 revenues collected under these rates have potential to impact Tacoma Power's
18 contracted power purchase and transmission costs. Its interests are unique and not
19 otherwise represented by other parties to this proceeding.
20

21 SERVICE OF DOCUMENTS

22 Petitioner, Tacoma Power, hereby designates the following representatives upon whom
23 service of documents may be made:
24
25

26 PETITION TO INTERVENE - 2
BP-16

BP-16-S-TA-01

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10 Tacoma Power
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15 (3) Rick Applegate
16 Power Management
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19 Tacoma, WA 98409-3192
20 Telephone: 253-502-8012
21 rapplegate@cityoftacoma.org

22 DATED this 9th day of December, 2014.

23 CITY OF TACOMA

24 By: /s/ William A. Gaines
25 William A. Gaines,
26 Director of Utilities/CEO

By: /s/ William C. Fosbre
William C. Fosbre,
Chief Deputy City Attorney

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this day I have e-mailed the foregoing document to the
3 listed parties, addressed as follows:

4 Hearing Clerk-L-7
5 rateclerk@bpa.gov

Mr. Kurt Casad
krcasad@bpa.gov

6 Mr. Barry Bennett
7 bbennett@bpa.gov

8 DATED this 9th day of December, 2014, in Tacoma, Washington.

9 /s/ James M. Russell _____
James M. Russell