

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

IN THE MATTER OF:	)	BPA Docket No. BP-16
	)	
FY 2016-2017	)	
PROPOSED POWER AND	)	
TRANSMISSION RATE	)	
ADJUSTMENT PROCEEDING	)	

**PETITION TO INTERVENE OF THE PNGC GROUP**

Pursuant to the Federal Register Notice in this matter, 79 FR 71984 (December 4, 2014), and Rule 1010.4 of Bonneville Power Administration’s (BPA’s) Procedures Governing Bonneville Power Administration; Rate Hearings, 51 FR 7611 (March 5, 1986), the Pacific Northwest Generating Cooperative and its 14 members (collectively, the “PNGC Group”) respectfully submit this Petition to Intervene in this docket and to participate jointly and collectively as a Party.

In support of this petition, the PNGC Group states the following:

1. The names of the entities requesting party status in this proceeding are:

Pacific Northwest Generating Cooperative  
Blachly-Lane County Cooperative Electric Association  
Central Electric Cooperative, Inc.  
Clearwater Power Company  
Consumers Power, Inc.  
Coos-Curry Electric Cooperative, Inc.  
Douglas Electric Cooperative, Inc.  
Fall River Rural Electric Cooperative, Inc.  
Lane Electric Cooperative, Inc.  
Lincoln Electric Cooperative, Inc.  
Northern Lights, Inc.  
Okanogan County Electric Cooperative, Inc.

Petition to Intervene of PNGC Group

Raft River Rural Electric Cooperative, Inc.  
Umatilla Electric Cooperative Association  
West Oregon Electric Cooperative, Inc.

2. The address of the PNGC Group is:

711 NE Halsey St.  
Portland, OR 97232

3. The PNGC Group has the following interest in the proceeding. Pacific Northwest Generating Cooperative is a cooperative corporation organized under the laws of the State of Oregon and is a Joint Operating Entity pursuant to the Northwest Power Act, 16 USC § 839(c)(b)(7). It will purchase power from BPA Power Services under a Contract High Water Mark Contract to meet the needs of the utilities that will be its members during the FY 2016-2017 rate period. The proceeding will materially and substantially affect BPA's rates for power. Therefore, as preference power customers of BPA, the PNGC Group claims a direct and substantial interest in this proceeding.

4. In addition, the proceeding will materially and substantially affect rates for transmission services. The Pacific Northwest Generating Cooperative and its members will purchase transmission service from BPA Transmission Services during the FY 2016-2017 rate period. Therefore, as transmission customers of BPA, the entities in the PNGC Group claim a direct and substantial interest in this proceeding.

5. No other Party may adequately represent the PNGC Group's interests in this proceeding.

6. Although not required by either the Federal Register Notice or the Procedures Governing Bonneville Power Administration Rate Hearings, the joint and collective representation of the interests of the Pacific Northwest Generating Cooperative and of its

members will avoid duplication of effort and aid in the efficient administration of this proceeding.

7. Service should be made on the following persons on behalf of the PNGC Group.

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8. For the reasons stated above, the PNGC Group respectfully requests that it be allowed to intervene as a Party.

Dated this 11th day December, 2014.

/s/ Christopher R. Hill

Christopher R. Hill  
Attorney for PNGC Group

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11th day of December, 2014, a PETITION TO INTERVENE OF PNGC GROUP was served by electronic mail addressed to:

Hearing Clerk, L-7  
Bonneville Power Administration  
905 NE 11<sup>th</sup> Ave.  
Portland, OR 97232  
E-mail: *rateclerk@bpa.gov*

With true and correct copies sent by electronic mail to:

Kurt Casad, LP-7  
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/s/ Christopher R. Hill

Christopher R. Hill  
Attorney for PNGC Group