



**Portland General Electric Company**  
Legal Department  
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**David F. White**  
Assistant General Counsel

December 12, 2014

*Via Electronic Mail:* [rateclerk@bpa.gov](mailto:rateclerk@bpa.gov)

Hearing Clerk – L-7  
Bonneville Power Administration  
905 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

**Re: File No. BP-16: Fiscal Year (FY) 2016-2017 Proposed Power and Transmission Rate Adjustments**

Attention Hearing Clerk:

Attached for filing in BP-16 is Portland General Electric Company's (PGE) Petition to Intervene in the above-referenced docket. Further, PGE is serving an electronic copy of our petition upon Bonneville Power Administrations' Office of General Counsel: Kurt Casad and Barry Bennett.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "D. White". The signature is written in a cursive, slightly slanted style.

David F. White  
Assistant General Counsel

DFW:qal  
Enclosures  
cc: BPA Office of General Counsel:  
Kurt Casad, [krcasad@bpa.gov](mailto:krcasad@bpa.gov)  
Barry Bennett, [bbennett@bpa.gov](mailto:bbennett@bpa.gov)

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

*In the Matter of:*

The Bonneville Power Administration

2016 RATE ADJUSTMENT PROCEEDING

Docket No. BP-16

**PETITION TO INTERVENE OF  
PORTLAND GENERAL ELECTRIC  
COMPANY**

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Pursuant to the notice posted in the Federal Register on December 4, 2012, regarding Bonneville Power Administration's ("BPA") Fiscal Year (FY) 2016-2017 Proposed Power and Transmission Rate Adjustments, 79 Fed. Reg. 71984 (2014), and section 1010.4 of the Rules Procedure Governing Bonneville Power Administration Rate Hearings, 51 Fed. Reg. 7611(1986), Portland General Electric Company ("PGE") hereby files this Petition to Intervene as a party in these proceedings. PGE requests that it be granted party status in BPA Docket No. BP-16, including any sub-dockets to that proceeding.

**I. PETITION TO INTERVENE**

PGE is a corporation created and organized under the laws of the State of Oregon with its principal office at 121 SW Salmon Street, Portland, Oregon 97204. PGE is an investor-owned utility engaged in, among other things, the business of generating, transmitting, and distributing electric power to retail customers in Oregon. PGE is an entity that can contract directly with BPA for the purchase of power under sections 5(b) or 5(c) of the Northwest Power Act for delivery in the region as defined by section 3(14) of the Northwest Power Act. The rates PGE will eventually pay to BPA for Priority Firm Power, ancillary services, and control area services

are the subject of the above-captioned proceeding. In addition, PGE purchases long and short-term firm and nonfirm transmission service from BPA under electric transmission service agreements. PGE's cost of providing electric service to its retail customer will be directly and materially affected by the outcome of this proceeding.

Accordingly, PGE has an interest in these proceedings and is eligible to be a party in this proceeding. *See* 79 Fed. Reg. at 71988. PGE's interests cannot be adequately represented by any other party, and, therefore, respectfully requests that it be allowed to intervene as a party in the above-captioned proceedings.

## **II. COMMUNICATIONS**

All correspondence, communications, pleadings, and other documents related to this proceeding should be served on the following:

David F. White  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
(503) 464-7701 (Telephone)  
(503) 464-2200 (Facsimile)  
[david.white@pgn.com](mailto:david.white@pgn.com)

Stefan Brown  
Analyst, Resource Strategy  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, Oregon 97204  
(503) 464-8937 (Telephone)  
(503) 464-2354 (Facsimile)  
[stefan.brown@pgn.com](mailto:stefan.brown@pgn.com)

### III. CONCLUSION

WHEREFORE, for the foregoing reasons, PGE respectfully requests that it be allowed to intervene in the BPA Docket No. BP-16, including any subdockets, as a party.

DATED this 12<sup>th</sup> day of December, 2014.

Respectfully submitted,



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David F. White, OSB No. 011382  
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## CERTIFICATE OF SERVICE

Pursuant to Sections 1010.4 and 1010.5 of the Bonneville Power Administration ("BPA") Rules of Procedure Governing Rate Hearings and BPA's December 4, 2014 Notice, 79 Fed. Reg. 71984, I hereby certify that I have this day caused a copy of the foregoing to be served via email on the following:

Hearing Clerk – L-7  
Bonneville Power Administration  
905 NE 11th Avenue  
Portland, Oregon 97232  
[rateclerk@bpa.gov](mailto:rateclerk@bpa.gov)

Mr. Kurt Casad, LP-7  
Office of General Counsel  
905 NE 11th Ave.  
Portland, Oregon 97232  
[pjburger@bpa.gov](mailto:pjburger@bpa.gov)

Mr. Barry Bennett, LT-7  
Office of General Counsel  
905 NE 11th Ave.  
Portland, Oregon 97232  
[bbennett@bpa.gov](mailto:bbennett@bpa.gov)

Dated at this 12<sup>th</sup> day of December, 2014.



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