

**UNITED STATES OF AMERICA
U.S. DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION**

In the Matter of:

2014 Oversupply Rate Proceeding

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BPA Docket No. OS-14

**PETITION TO INTERVENE OF
EDP RENEWABLES NORTH AMERICA LLC**

Pursuant to section 1010.4 of the Rules of Procedure Governing Rate Hearings of the Bonneville Power Administration (BPA) and the Federal Register notice issued on November, 8, 2012,¹ EDP Renewables North America LLC (EDPRNA) hereby files this Petition to Intervene as a party in the above-captioned proceeding.

I. COMMUNICATIONS

EDPRNA requests that communications in this proceeding be directed to the following individuals:

Leslie A. Freiman, Esq.*
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**Individuals designated for official service in this proceeding*

¹ 77 Fed. Reg. 66,963 (Nov. 8, 2012).

II. BACKGROUND

On March 6, 2012, BPA filed its Oversupply Management Protocol with the Federal Energy Regulatory Commission (FERC) in Docket No. EL11-44 as an amendment to BPA's Open Access Transmission Tariff. The protocol authorizes BPA to displace generation in its balancing authority area with Federal hydropower and provide compensation to generators for certain costs related to the displacement. EDPRNA is a party in interest in the FERC proceeding. BPA is holding the instant Docket No. OS-14 rate proceeding to establish rates to recover the costs already incurred under the Oversupply Management Protocol, and any future costs incurred up to September 30, 2015, in the event the Oversupply Management Protocol is renewed after it expires on March 30, 2013.

III. PETITION TO INTERVENE

EDPRNA is a Delaware limited liability company that develops, owns, and operates, through wholly or partially-owned subsidiaries, wind-powered electric generation facilities throughout the United States. Three subsidiaries of EDPRNA own wind-powered electric generation facilities that currently are interconnected to the transmission system owned and operated by BPA:

- Arlington Wind Power Project LLC, the owner of a 103 MW wind-powered electric generation facility located in Gilliam County, Oregon;
- Sagebrush Power Partners, LLC, the owner of a 101 MW wind-powered electric generation facility located in Kittitas County, Washington; and
- Wheat Field Wind Power Project LLC, the owner of a 97 MW wind-power electric generation facility located in Gilliam County, Oregon

These projects and their offtaker arrangements are dependent on transmission service on the BPA system. Through its subsidiaries, EDPRNA also currently holds 172 MW of transmission

service reservations on the BPA system. As the upstream owner and developer of wind generation projects that rely on and have reserved transmission capacity on the BPA system, EDPRNA is directly affected by BPA's OS-14 rates that are the subject of this proceeding. EDPRNA has a substantial and direct interest in the outcome of this proceeding that cannot be adequately represented by any other party. Accordingly, EDPRNA respectfully requests that it be permitted to intervene in this proceeding as a party with full rights.

IV. CONCLUSION

WHEREFORE, for the reasons set forth herein, EDPRNA respectfully requests that it be permitted to intervene with full rights to participate as a party to this proceeding.

Respectfully submitted,

/s/ Jessica C. Friedman

Margaret A. Moore

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Counsel for EDP Renewables North America LLC

November 15, 2012

CERTIFICATE OF SERVICE

I hereby certify that that I have this day served a copy of the foregoing Petition to Intervene of EDP Renewables North America LLC upon the party listed below via e-mail:

Mr. Allen Chan
LT-7, Office of the General Counsel
905 NE 11th Ave.
Portland, Oregon 97232
acchan@bpa.gov

Dated at Washington, D.C. this 15th day of November, 2012.

/s/ Jessica C. Friedman
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