

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

2014 Proposed Oversupply Rates

BPA Docket No. OS-14

PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT

Pursuant to the notice published in the Federal Register on November 8, 2012 regarding the Bonneville Power Administration's ("BPA") Proposed 2014 Oversupply Rates, Public Hearing and Opportunities for Public Review and Comment, 77 Fed. Reg. 66963-66966, and Section 1010.4 of the Procedures Governing Bonneville Power Administration Rate Hearings, 51 Fed. Reg. 7611 (1986), Renewable Northwest Project ("RNP") hereby files this Petition to Intervene as a party in the above-captioned proceeding. RNP requests that it be granted party status in Docket No. OS-14.

I. BACKGROUND

RNP is a non-profit regional advocacy group composed of renewable energy businesses and environmental, academic and consumer groups working together to facilitate responsibly developed renewable energy resources in the region. RNP monitors and actively participates in BPA forums related to the integration of Variable Energy Resources ("VERs"). RNP has been involved in several BPA rates cases, and has participated in the pre-rate case workshops leading up to this proceeding. In addition, RNP has commented extensively on and been engaged in discussions surrounding BPA's adoption and implementation of the Oversupply Management Protocol and its predecessor, the Environmental Redispatch Protocol.

Moreover, several of RNP's members are currently engaged in the development and/or operation of VERs in BPA's balancing authority area. As such, certain of these RNP members are transmission customers of BPA Transmission Services whose generation has been curtailed

pursuant to BPA’s Oversupply Management Protocol and who would be subject to the rates that BPA will consider in this proceeding. RNP’s members that are eligible customers in the interconnection queue of BPA Transmission Services will also be affected by the rates BPA is evaluating in this proceeding, as these rates have implications for project development and project financing. Accordingly, RNP has a substantial interest in the outcome of this proceeding, and there is no other party that can adequately represent RNP’s interests in this proceeding.

II. COMMUNICATIONS

RNP’s address is included below. All communications concerning this filing should be addressed to the following individuals, who should also be included on the official service list in this proceeding:

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III. RESERVATION OF LEGAL RIGHTS

BPA’s Oversupply Management Protocol is currently being challenged in proceedings before the Federal Energy Regulatory Commission (“FERC”) and the U.S. Court of Appeals for the Ninth Circuit (the “Court”). Petitions for review of the predecessor to the Oversupply Management Protocol, the Environmental Redispatch Protocol, were also filed with the Court. The Court has not yet acted on the merits of the petitions for review, nor has FERC taken action on the Oversupply Management Protocol. If either FERC or the Court acts on the merits in those proceedings, it could significantly impact the OS-14 proceeding.

RNP’s participation in OS-14 is not intended to waive any of RNP’s or its members’ rights in the above-referenced proceedings before the Court or FERC or in the related FERC

proceeding on BPA's Petition for Declaratory Order Granting Reciprocity Approval in Docket No. NJ12-7-000.¹ RNP's participation in OS-14 should not be construed as a change in the positions it has taken in Docket Nos. EL11-44 and NJ12-7, and RNP expressly preserves all of its rights in those proceedings before FERC related to the Oversupply Management Protocol.

IV. PETITION TO INTERVENE

WHEREFORE, for the reasons stated in this Petition to Intervene, RNP respectfully requests that it be allowed to intervene as a party in the above-captioned proceeding.

DATED: November 15, 2012.

Respectfully submitted,

/s/ Dina Dubson

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¹ RNP is not a party to the Court proceedings on the Oversupply Management Protocol or the Environmental Redispatch Protocol; however, some of its members are petitioners in those proceedings. As a member of the Northwest Wind Group and the American Wind Energy Association ("AWEA"), RNP has been actively involved in FERC Docket No. EL11-44 on the Oversupply Management Protocol and the Environmental Redispatch Protocol. RNP also submitted a joint Protest with AWEA in Docket No. NJ12-7.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT on Bonneville Power Administration's Office of General Counsel and Hearing Clerk by sending a copy via e-mail to the following e-mail addresses:

rateclerk@bpa.gov and acchan@bpa.gov.

DATED: November 15, 2012.

/s/ Dina Dubson

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