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

| | | |
|---|---|---|
| **In the Matter of:** | ) | BPA File No. OS-14 |
| | ) | |
| PROPOSED 2014 OVERSUPPLY RATES | ) | |
| | ) | PETITION FOR LEAVE |
| | ) | TO INTERVENE |

**PETITION FOR LEAVE TO INTERVENE**
**BY THE WESTERN PUBLIC AGENCIES GROUP**

Pursuant to the Federal Register Notice published on November 8, 2012, 77 Fed. Reg. 66,693 (2012) and the Bonneville Power Administration's Rules of Procedures Governing Rate Hearings, 52 Fed Reg. 7611 (1985), each of the utilities that comprise the Western Public Agencies Group ("WPAG")[1] hereby individually file this petition for leave to intervene in the above captioned matters each as a party of right. In support of this petition, the following information is provided.

**I.**

Each of the utilities that comprise the WPAG currently purchases wholesale power from the Bonneville Power Administration ("BPA") under rates that will be affected by the proposed Oversupply Rate that is to be a new power rate, and will continue to do so during the period when the rates that will be established in this proceeding are in effect. Some of the WPAG utilities also either own their own wind generation or purchase the output of a third party's wind generation and, therefore, will be affected by the proposed Oversupply Rate that is to be a new control area service rate.

[1] The utilities that comprise WPAG are listed on Attachment A hereto.

**II.**

The rates that each of the WPAG utilities will pay to BPA for wholesale power will include the proposed new Oversupply Power Rate, and this will directly affect the end-use consumers served by the WPAG utilities. The rates that each of the WPAG utilities that either own their own wind generation or purchase the output of a third party's wind generation may include the proposed new Oversupply Control Area Service Rate, and will this could directly affect the end use consumers served by those WPAG utilities. No other party to this proceeding will adequately represent the interests of each of the WPAG utilities.

**III.**

All materials, documents and communications relating to the above captioned proceedings should be served on the following:

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Telephone: (360)-992-3088
E-Mail: BMoore@clarkpud.com

WHEREFORE, based on the foregoing each of the utilities that comprise the WPAG respectfully requests party status in the above captioned proceedings.

Dated this 13th day of November, 2012

MARSH MUNDORF PRATT SULLIVAN + McKENZIE, P.S.C.

*/s/ Terence L. Mundorf*
Terence L. Mundorf
Ryan S. Neale
Attorneys for the Western Public Agencies Group

## ATTACHMENT A

The utilities that comprise the Western Public Agencies Group are Benton Rural Electric Association, the Cities of Port Angeles, Ellensburg and Milton, Washington, the Towns of Eatonville and Steilacoom, Washington, Alder Mutual Light Company, Elmhurst Mutual Power and Light Company, Lakeview Light and Power Company, Ohop Mutual Light Company, Parkland Light and Water Company, Public Utility Districts No. 1 of Clallam, Clark, Grays Harbor, Kittitas, Lewis, Mason, Skamania and Wahkiakum Counties, Washington, Public Utility District No. 3 of Mason County, Washington and Public Utility District No. 2 of Pacific County, Washington.

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## CERTIFICATE OF SERVICE

Pursuant to Section 1010.4 of the Bonneville Power Administration ("BPA") Rules of Procedure Governing Rate Hearings and BPA's November 8, 2012 Notice, 77 Fed. Reg.66,693, I hereby certify that I have this day served via email a copy of the foregoing on:

| | |
|---|---|
| Mr. Allen Chan, LT-7<br>Office of General Counsel<br>905 NE 11th Ave.<br>Portland, Oregon 97232<br>acchan@bpa.gov | Hearing Clerk – L-7<br>Bonneville Power Administration<br>905 NE 11th Avenue<br>Portland, Oregon<br>rateclerk@bpa.gov |

Dated at Mill Creek, Washington this 13th day of November, 2012.

*/s/ Ryan S. Neale*
Ryan S. Neale