

UNITED STATES DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

<i>In the Matter of:</i>)		
)		
Average System Cost Review of:)		
)		
PacifiCorp,)	BPA Docket Nos.	ASC-10-PA-01
Portland General Electric Company)		ASC-10-PG-01
Franklin County PUD,)		ASC-10-FR-01
Idaho Power Company,)		ASC-10-IP-01
NorthWestern Energy,)		ASC-10-NW-01
Snohomish PUD)		ASC-10-SN-01
Puget Sound Energy, Inc.)		ASC-10-PS-01
)		
)		

PETITION TO INTERVENE OF AVISTA CORPORATION

Bonneville Power Administration (“BPA”) has posted notice of FY 2010-2011 Average System Cost (“ASC”) Initial Utility filings on BPA’s website. BPA’s notice provided that petitions to intervene in the FY 2010-2011 ASC Review Process are due by October 21, 2008. Pursuant to Section III.D of BPA’s 2008 Average System Cost Methodology, any Regional Power Sales Customer or state utility Regulatory Body who so requests will be accorded party status for Bonneville’s ASC review process if said request is received by the established deadline. The filing Utility is automatically a party to its own ASC review proceeding.

Accordingly, Avista Corporation (“Avista”) hereby files this Petition to Intervene as a party in each of Docket No. ASC-10-PA-01 (PacifiCorp), Docket No. ASC-10-PG-01 (Portland General Electric Company), Docket No. ASC-10-NW-01 (NorthWestern

Energy), Docket No. ASC-10-IP-01 (Idaho Power Company), Docket No. ASC-10-FR-01 (Public Utility District No. 1 of Franklin County, Washington), Docket No. ASC-10-SN-01 (Snohomish Public Utility District), and Docket No. ASC-10-PS-01 (Puget Sound Energy, Inc.).

I. PETITION TO INTERVENE

Avista is a corporation created and organized under the laws of the State of Washington with its principal office in Spokane, Washington. Avista is an investor-owned utility engaged in among other things, the business of generating, transmitting, and distributing electric power to wholesale and retail customers in Idaho and Washington.

Bonneville's 2008 Average System Cost Methodology defines a "Regional Power Sales Customer" as "any entity that can contract directly with BPA for the purchase of power under sections 5(b), 5(c), or 5(d) of the Northwest Power Act for delivery in the region as defined by section 3(14) of the Northwest Power Act."¹ Avista is an entity that can contract directly with Bonneville for the purchase of power under §§ 5(b) or 5(c) of the Northwest Power Act for delivery in the region as defined by § 3(14) of the Northwest Power Act and, therefore is a Regional Power Sales Customer eligible for party status in the above-captioned proceedings.

Avista has an interest in these proceedings, and Avista's interests cannot be adequately represented by any other party. Accordingly, Avista respectfully requests that it be allowed to intervene as a party in the above-captioned proceedings.

II. COMMUNICATIONS

All materials and communications relating to these proceedings should be served on the following:

Larry La Bolle
Director, Federal and Regional Affairs
Avista Corporation
1411 E. Mission Ave., MSC-7
Spokane, WA 99202
Telephone: (509) 495-4710
Facsimile: (509) 777-5495
E-mail: larry.labolle@avistacorp.com

Michael G. Andrea
Staff Attorney
Avista Corporation
1411 E. Mission Ave., MSC-23
Spokane, WA 99202
Telephone: (509) 495-2564
Facsimile: (509) 777-5468
E-mail: michael.andrea@avistacorp.com

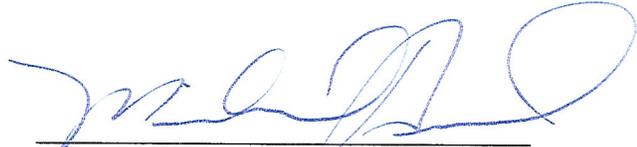
III. CONCLUSION

WHEREFORE, for the foregoing reasons, Avista respectfully requests that it be allowed to intervene in the above-captioned proceedings as a party.

DATED this 21st day of October 2008.

Respectfully Submitted,

AVISTA CORPORATION



Michael G. Andrea, WSBA No. 38684
Staff Attorney
Attorney for Avista Corporation

¹ 2008 ASC Methodology, Section I.Q.

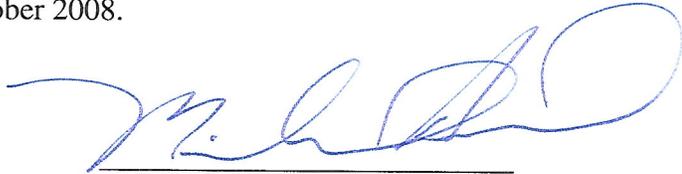
CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition to Intervene of Avista Corporation upon the parties listed below via e-mail:

Michelle Manary, Supervisory Public Utilities
Specialist – 2008 ASC Methodology
Email: BPAAverageSystemCost@bpa.gov

BPA's Office of General Counsel
Kurt Casad, Office of the General Counsel, BPA
Email: krcasad@bpa.gov

DATED this 21st day of October 2008.



Michael G. Andrea