

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

<b>FY 2010-11 AVERAGE SYSTEM COST</b>	)	
<b>REVIEW PROCESS FOR AVISTA, IDAHO</b>	)	<b>DOCKET NOS. ASC-10-AV-01</b>
<b>POWER COMPANY, AND PACIFICORP</b>	)	<b>ASC-10-IP-01</b>
	)	<b>ASC-10-PA-01</b>
	)	

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**PETITION TO INTERVENE BY THE  
IDAHO PUBLIC UTILITIES COMMISSION**

Pursuant to the notification provided by the Bonneville Power Administration (“Bonneville” or “BPA”), the Idaho Public Utilities Commission (“Idaho PUC”) respectfully moves to intervene in the three above-entitled proceedings. Bonneville’s Public Notice of the FY 2010-11 Average System Cost (ASC) review process requires Petitions to Intervene to be filed no later than the close of business on October 21, 2008.

**I. INTEREST OF PETITIONER**

The Idaho PUC is the state regulatory commission empowered pursuant to Idaho Code, Title 61, to regulate all investor-owned utilities (IOUs) operating within the State of Idaho. In this capacity, the Idaho PUC is responsible for regulating the retail electric rates of Avista Utilities, Idaho Power Company, and PacifiCorp dba Rocky Mountain Power. *Idaho Code* § 61-502. Until the residential exchange program (REP) was suspended last summer, these Idaho IOUs received benefits under the REP Settlement Agreements. 16 U.S.C. § 839c(c). Each utility’s ASC is part of the REP calculation. 16 U.S.C. § 839c(c)(7).

Over the years, residential and small-farm irrigation customers of the three Idaho IOUs have shared in the benefit of the region’s federal hydroelectric projects. The suspension of the REP credits in June 2007 resulted in a net rate increase for more than 560,000 Idaho

customers. The Idaho PUC has previously participated in the 2008 ASC Methodology docket (No. ASCM-08) and in the FY 2009 ASC review for these three utilities. As the state regulatory body, the Idaho PUC has a vested interest that the IOUs correctly calculate their respective ASCs.

Consequently, the Idaho PUC has a direct and substantial interest in the calculation of the FY 2010-11 ASC of the three IOUs that it regulates.

## II. COMMUNICATIONS AND SERVICE

The Idaho PUC requests that all communications and papers relating to this proceeding be served upon:

D. Neil Price  
Donald L. Howell, II  
Deputy Attorneys General  
Idaho Public Utilities Commission  
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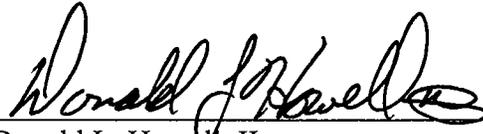
The Idaho PUC requests that these names be added to the official service list for the above-captioned docket.

## III. CONCLUSION

The Idaho PUC intends to participate in these three dockets and has a definable interest in the outcome of these proceedings. Granting the Idaho PUC intervention in the three FY 2010-11 ASC dockets will promote the public interest. Consequently, the Idaho PUC respectfully requests that its Petition to Intervene as a party in these three dockets be granted.

Respectfully submitted this 21<sup>st</sup> day of October 2008.

FOR THE IDAHO PUBLIC UTILITIES COMMISSION



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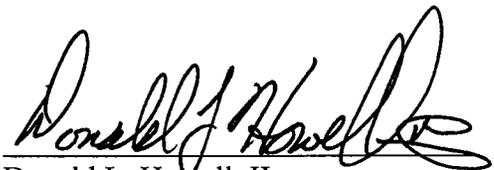
## CERTIFICATE OF SERVICE

I hereby certify that a copy of the Idaho Public Utilities Commission's Petition to Intervene in BPA Docket Nos. ASC-10-AV-01, ASC-10-IP-01, ASC-10-PA-01 was emailed to the following on October 21, 2008.

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