

UNITED STATES DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

<i>In the Matter of:</i>)	
)	
WP-10 Rate Case (FY 2010-2011) Average System Cost Methodology)	BPA Docket Nos:
)	
Avista Corporation,)	ASC-10-AV-01
PacifiCorp)	ASC-10-PA-01
Portland General Electric Company)	ASC-10-PG-01
NorthWestern Energy)	ASC-10-NW-01
Puget Sound Energy)	ASC-10-PS-01
Franklin County PUD)	ASC-10-FR-01
Snohomish PUD)	ASC-10-SN-01
)	
)	PETITION TO INTERVENE OF IDAHO POWER COMPANY

On October 17, 2008, Bonneville Power Administration (“Bonneville”) posted notice of WP-10 Rate Case (FY 2010-2011) Average System Cost Methodology (“ASCM”) Initial Utility filings on Bonneville’s electronic website. Bonneville’s notice provided that petitions to intervene in the WP-10 Rate Case (FY 2010-2011) are due by October 21, 2008. Pursuant to Final 2008 ASC Methodology, any Regional Power Sales Customer or state utility Regulatory Body who so requests will be accorded party status for Bonneville’s ASCM 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, Idaho Power Company (“Idaho Power”) hereby files this Petition to Intervene as a party in each of the above captioned proceedings.

I. PETITION TO INTERVENE

Idaho Power Company is a corporation organized under the laws of the State of Idaho, with its principal offices located in Boise, Idaho. Idaho Power is an investor-owned utility engaged in, among other things, generating, transmitting, and retail sales of electricity to residential and small farm customers in the States of Idaho and Oregon.

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 Idaho Power 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.

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

¹ 2008 ASC Methodology, Section I.Q.

II. NOTICE AND COMMUNICATIONS

All correspondence, communications, pleadings and other documents related to this proceeding should be addressed to the following individuals:

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III. CONCLUSION

WHEREFORE, for the foregoing reasons, Idaho Power 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,

PAINE HAMBLEN LLP

By: /s/ R. Blair Strong

R. Blair Strong
Attorneys for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this day served a copy of the foregoing Petition to Intervene of Idaho Power Company 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.

By: /s/ R. Blair Strong
R. Blair Strong
Attorney for Idaho Power Company